TLLINOIS ENVIRONMENTAL PROTECTION AGENCY







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			AL FACIL	ITY INFOR			
USEPA ID #:	<u>170000.</u>				IEPA ID #: \		
Facility Name:	Keystone	Strel + W	ive Compa	<u>m</u>			9/497-1020
	2000 S	Adams	 			County: P	
City:	eoria			State: 1L		Zip Code: 4	01641
Region: 3			Inspection Date:	04/22/98	Cphone call	Time:	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
Weather:				and 04/2:			
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Notified As: C	enevador C				Regulated As: (Generator /	TS
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CEI: CME	/O&M: CS	I: NRR:	F/U to: /	/ CC: F	PIF: CVI:	CSE: Of	ther: 🗙
	N	OTIFICAT	ION INFOR	MATION (EPA 8700-1	2)	
Notification Date	: 08/19/8	(initial)				1 1	(subsequent)
		ART A PER	MIT INFO	RMATION	(EPA 3510-	3)	
Part A Date:	/18/80		Amended:	1 1	-, -, -, -, -, -, -, -, -, -, -, -, -, -	Withdrawi	n: 01/28/92
		PART	B PERMIT	INFORMA	TION		
P Submitted	l/Issued (circle or	ne): / /			. 		
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Has the company	been referred to	: USEPA: 131	108 185 IA	.GO: / /	County St	ate's Attorney:	/ /
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CACO: /	/		CAFO: /	/	Fe	deral Court Orde	r: / /
Consent Decree:	07/29/93	·	IPCB Order:	1 1		te Court Order:	1 1 .
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	Dallas		, , , ,			City:					
	TY		Zip C	Code: 7	5234	State: Zip Code:					
Phone #:					_	Phone #:					
PERSO	ON(S) INTERVIEWE	D			TITLE		PHONE #				
Bob	miller				Keystone		309/697-7020				
	Semelroth				Keystone						
	Harvenberg				Waste Man	egemen!		309/694-624			
	adelle Sarmient	0			Wask Mana	()		309/694-029			
	Tim Smith				Waste Mana			309 1565-428			
Mid	Michelle Schott				Wask Mana	grment		309/565-428			
				AGENCY/DIVIS	ION		PHONE #				
John Tripses			TEPA			309/693-546	Z				
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PREPA	ARED BY				AGENCY/DIVIS	SION		PHONE #			
	a Trioses				IEPA			309/693-5462			
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Narrative

On April 22, 1998 at about 10:30 a.m., I was notified by Bob Miller of Keystone Steel & Wire Company (Keystone) that Keystone had shipped some rubble from the repair of a galvanizing furnace to Peoria City/County Landfill #2. He believed that the waste could be characteristically hazardous for lead (D008). (Peoria City/County Landfill #2 is not permitted to accept hazardous waste). I told him to notify the landfill and determine if it was possible to locate and remove the waste.

On April 22, 1998 at 2:05 p.m., I went to Peoria City/County Landfill #2. Peoria City/County Landfill #2 is owned by Joint City of Peoria, County of Peoria Solid Waste Disposal Facility Board and operated by Waste Management of Illinois, Inc. I interviewed Tim Smith and Michelle Schott of Waste Management. Photographs 1 through 12 (taken on April 22, 1998) show the area where the waste from Keystone was dumped. Landfill personnel has marked the area with stakes and tape. I obtained a copy of the landfill gate ticket for the April 21, 1998 shipment. It is attached to this report. According to the ticket, the shipment was received at the landfill at 1:12 p.m., weighed 25 tons, and listed PDC Services as the customer.

On April 23, 1998, I went to the landfill and observed the attempt to locate and remove the waste. Steve Harenberg and Bernadette Sarmiento were there for Waste Management and Bob Miller and Dave Semelroth were present for Keystone. Photographs 1 through 8 (taken on April 23, 1998) show the excavation that was done to locate and remove the waste. Photograph 4 shows a close up of one of the bricks that Keystone personnel identified as part of the shipment. Three roll-off boxes of waste (a mixture of the rubble and other landfill waste) were excavated and ultimately disposed of as hazardous waste (D008). Copies of the manifests are attached to this report.

The excavated waste was shipped from Peoria City/County Landfill #2 to Peoria Disposal Company's hazardous waste landfill on May 13, 1998. Copies of the three manifests are attached.

The following apparent violations for Keystone were noted:

Section 703.121(a) of the Regulations - Keystone failed to comply with the requirements of Section 722.134(a)(4) (see Section 725.131 below) and no longer qualifies for the exemption from RCRA permitting for generators who accumulate waste on-site for 90 days of less.

Section 703.121(b) of the Regulations - Keystone failed to comply with the requirements of Section 722.134(a)(4) (see Section 725.131 below) and no longer qualifies for the exemption from RCRA permitting for generators who accumulate waste on-site for 90 days of less.

Section 722.111 of the Regulations - Keystone failed to make the correct hazardous waste determination of the rubble from the repair of a galvanizing furnace (D008).

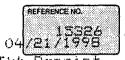
- Section 722.112(c) of the Regulations Keystone sent rubble from the repair of a galvanizing furnace (D008) to a disposal facility that did not have a USEPA Identification Number.
- Section 722.120(a) of the Regulations Keystone sent rubble from the repair of a galvanizing furnace (D008) to a disposal facility without using a manifest.
- Section 722.120(b) of the Regulations Keystone sent rubble from the repair of a galvanizing furnace (D008) off-site without designating on the manifest one facility which is permitted to handle the waste.
- Section 722.121(a) of the Regulations Keystone sent rubble from the repair of a galvanizing furnace (D008) off-site without using the manifest supplied by the Agency.
- Section 722.122 of the Regulations Keystone sent rubble from the repair of a galvanizing furnace (D008) off-site without using the manifest supplied by the Agency.
- Section 722.123(a) of the Regulations Keystone sent rubble from the repair of a galvanizing furnace (D008) off-site without signatures on the manifest, without retaining one copy of the manifest, and without sending a copy of the manifest to the Agency.
- Section 722.123(b) Keystone sent rubble from the repair of a galvanizing furnace (D008) off-site without giving copies of the manifest to the transporter.
- Section 725.131 of the Regulations By rubble from the repair of a galvanizing furnace (D008) to a nonhazardous waste landfill (Peoria City/County Landfill #2), Keystone failed to avoid sudden planned or unplanned releases of hazardous waste to the environment.
- Section 728.107(a) of the Regulations Keystone failed to determine if the rubble from the repair of a galvanizing furnace (D008) was restricted from land disposal.
- Section 728.107(a)(1) or Section 728.107(a)(2) of the Regulations Keystone failed to notify the disposal facility if the rubble from the repair of a galvanizing furnace (D008) did or did not meet the treatment standard.
- Section 21(e) of the Act Keystone disposed of the rubble from the repair of a galvanizing furnace (D008) at a facility (Peoria City/County Landfill #2) that did not have a permit to accept that waste.
- Section 21(f) of the Act Keystone failed to comply with the requirements of Section 722.134(a) and no longer qualifies for the exemption from RCRA permitting for generators who accumulate waste on-site for 90 days of less.

Section 21(i) of the Act - Keystone generated rubble from the repair of a galvanizing furnace (D008) and failed to comply with the requirements of regulations adopted by the Board under subsections (a) and (c) of Section 22.4 of the Act.

(DRIVER: PLEASE SIGN BELOW)

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Tkt Reprint

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Time

Date

In: MLS 01:12 PM 04/21/1998 Out: MLS 01:26 PM 04/21/1998

PEORIA LANDFILL

5.150

BOX 99AA

RR#2

BRIMFIELD, IL 61517

309-565-4281

FAX:

COMMENTS

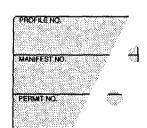
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PDC SERVICES

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PEORIA

IL 61612



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3. Generator's Name and Mailing Address	ILP20000 Locatio	on if Different	<u> </u>	. 1		of I Illinois la	cument No
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7000 S.W. Adams Peoria, IL 61607 4. 24 HOUR EMERGENCY AND SPILL A	Brimf:	W. Cottonwigld, IL, 6	1517	A - DE		enerator's	
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7. Transporter 2 Company Name	· 8.	US EPA I	D Number			nois Transporter	
9. Designated Facility Name and Site Addr	ess 10.	US EPA I	D Number		G. IIIi	nois	Trans
Peoria Disposal Company	#1	• • •			ID.	cility's	B 8 L
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WASTE MANIFEST 3. Generator's Name and Mailing Address Kaystone Steel and Wire Cor 7000 S.W. Adams Peoria. IL 61607	Locati npany 1150	on if Different L W. Cottonwood Ro	oad - A	IL B. Wi	nois Manifest Do	637	Number FEE
24 HOUR EMERGENCY AND SPILL ASSIST Transporter 1 Company Name	ANCE NUMBERS 6.	US EPA ID Number		C. Illi	enerator's 14.	s ID	
PDC Transportation 7. Transporter 2 Company Name	8.	ILD009848193 US EPA ID Number			09) 674-517 nois Transporter's		
9. Designated Facility Name and Site Address	10.	US EPA ID Number		G. Illii		Tra	anspon
Peoria Disposal Company #1 4349 Southport Road Peoria, IL 61615		T1 D00000E013		ID H. Fa	cility's Phone	3 8	1 2
11. US DOT Description (Including Proper Shipping	ng Name, Hazard	ILD000805812 Class, and ID Number)	12. Conta	iners	09)676-489 13. Total	14. Unit	
a "RQ" Hazardous Waste Solid PG III (D008)	, n.o.s.,	9, NA 3077,	No.	Туре	Quantity	Wt/Vol	XX
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J. Additional Description for Materials Listed Abov	and the second s	rate out to the first or a to the territorial description of the second			ndling Codes for		Autho
カメディ35 15. Special Handling Instructions and Additional In	nformation						
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NABRG #171							
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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BUREAU OF LAND/FIELD OPERATIONS SECTION





	·	GENER	AL FACILI	TY INFOR	MATION		
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Facility Name:	Keystone	Steel + 1	Dire Com	Da M			7/697-7026
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City: Pe	oria			State:	.	Zip Code:	61641
Region:	3		Inspection Date:	01/22/98	Cohone cal	Time:	·
Weather:		,		01/23/98	inep at Peo	ria City/C	bunty LF
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Notification Dat	e: 08 /18 /8					1 1	(subsequent)
	P	ART A PER	EMIT INFO	RMATION	(EPA 3510-	3)	
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Dave	Semelroth	·		Design	Engineer		309/697-	7020		
Ron	Edwards			Peoria Di	sposal Co	mpan	309/688-0	760		
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Denn	is Porter	Peoria D			309/688	-0760				
Gary	NSPECTION PARTICIPANT(S)				isposal C		309/688 -	0760		
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x = Cont	tinuing Violation)								

Narrative

On January 22, 1998 at about 4:30 p.m., I received a telephone call from Bob Miller of Keystone Steel & Wire Company (Keystone). He informed me that some spent pickle liquor (K062) and debris from the cleaning circle was placed in a ramada hopper over the weekend or on 3rd shift Monday. The cleaning circle is the series of tanks where steel is pickled and rinsed. The spent pickle liquor (K062) and debris were generated during some maintenance and cleaning of pipes in that area. Sometime after that the spent pickle liquor (K062) and debris were placed in a roll-off box with drawing compound waste and shipped to Peoria City/County Landfill. Peoria City/County Landfill is not permitted to accept hazardous waste.

I told Mr. Miller to contact the landfill and tell them about the shipment. I also told him to ask them if they could locate the area where the waste was placed so it could be excavated and disposed of in a hazardous waste landfill. I also advised him that Keystone should investigate their requirements to notify the Illinois Emergency Management Agency (IEMA) about the release of K062 spent pickle to the environment. Keystone did notify IEMA and a copy of the incident report is attached.

Mark Rein of Peoria Disposal Company called at about 4:45 p.m. about the incident. He had been contacted by Keystone. Peoria Disposal Company is a sister company of Peoria City/County Landfill, Inc., the operator of Peoria City/County Landfill. I asked if they would try to determine where the waste was placed and remove it. He told me that the waste was received at the landfill at 1:13 p.m. on January 20, 1998.

On January 23, 1998 at 1:00 p.m., I went to Peoria City/County Landfill. Peoria City/County Landfill is owned by the Joint City of Peoria, County of Peoria Solid Waste Disposal Facility Board and operated by Peoria City/County Landfill, Inc. I met with Ron Edwards, PDC vice president, and Dennis Porter, landfill manager. They provided me with a copy of the manifest which is attached to this report. The manifest lists the waste as "Drawing Compound & Waste Lime, 20 cu. yd. Box" and not as K062 spent pickle liquor. They had been able to locate the area where waste was placed on January 20, 1998 and no additional waste had been placed in that area. They were about to begin excavating the area to try to find the waste. The initial excavation is shown in photographs 1 and 2. The bulldozer operator from January 20, 1998, Gary Roche, arrived and said that the waste was placed further to the south. David Semelroth of Keystone arrived and assisted in trying to identify the waste. Based on information from Mr. Roche, an area about 60 foot square was excavated to a depth of approximately 1 foot (until the daily cover from the previous lift of waste was observed). The excavated waste was placed in piles. See photographs 3, 4, 5, 6, 7, 8, and 9. As the waste was excavated, Mr. Semelroth, Mr. Edwards, and I tried to spot the spent pickle liquor (K062). Mr. Semelroth said that the waste would be a tan granular material. We were not able to specifically identify the spent pickle liquor (K062) in the mixture of the other wastes. On my recommendation, Mr. Semelroth agreed that Keystone would dispose of all of the excavated material as a hazardous waste. Photograph 10 shows the excavated waste being placed into a roll-off box. I left the site at 3:50 p.m.

The excavated waste was shipped from Peoria City/County Landfill to Peoria Disposal Company's hazardous waste landfill on March 5, 1998. Copies of the five manifests are attached.

The following apparent violations for Keystone were noted:

- Section 703.121(a) of the Regulations Keystone failed to comply with the requirements of Section 722.134(a)(4) (see Section 725.131 below) and no longer qualifies for the exemption from RCRA permitting for generators who accumulate waste on-site for 90 days of less.
- Section 703.121(b) of the Regulations Keystone failed to comply with the requirements of Section 722.134(a)(4) (see Section 725.131 below) and no longer qualifies for the exemption from RCRA permitting for generators who accumulate waste on-site for 90 days of less.
- Section 722.111 of the Regulations Keystone failed to make the correct hazardous waste determination of the spent pickle liquor (K062) and debris.
- Section 722.112(c) of the Regulations Keystone sent spent pickle liquor (K062) and debris to a disposal facility that did not have a USEPA Identification Number.
- Section 722.120(a) of the Regulations Keystone sent spent pickle liquor (K062) and debris to a disposal facility without using a manifest.
- Section 722.120(b) of the Regulations Keystone sent spent pickle liquor (K062) and debris off-site without designating on the manifest one facility which is permitted to handle the waste.
- Section 722.121(a) of the Regulations Keystone sent spent pickle liquor (K062) and debris off-site without using the manifest supplied by the Agency.
- Section 722.122 of the Regulations Keystone sent spent pickle liquor (K062) and debris off-site without using the manifest supplied by the Agency.
- Section 722.123(a) of the Regulations Keystone sent spent pickle liquor (K062) and debris off-site without signatures on the manifest, without retaining one copy of the manifest, and without sending a copy of the manifest to the Agency.
- Section 722.123(b) Keystone sent spent pickle liquor (K062) and debris off-site without giving copies of the manifest to the transporter.
- Section 725.131 of the Regulations By sending spent pickle liquor (K062) and debris to a nonhazardous waste landfill (Peoria City-County Landfill), Keystone failed to avoid sudden planned or unplanned releases of hazardous waste to the environment.
- Section 728.107(a) of the Regulations Keystone failed to determine if the spent pickle liquor

(K062) and debris was restricted from land disposal.

- Section 728.107(a)(1) or Section 728.107(a)(2) of the Regulations Keystone failed to notify the disposal facility if the spent pickle liquor (K062) and debris did or did not meet the treatment standard.
- Section 21(e) of the Act Keystone disposed of the spent pickle liquor (K062) and debris at a facility (Peoria City-County Landfill) that did not have a permit to accept that waste.
- Section 21(f) of the Act Keystone failed to comply with the requirements of Section 722.134(a) and no longer qualifies for the exemption from RCRA permitting for generators who accumulate waste on-site for 90 days of less.
- Section 21(i) of the Act Keystone generated spent pickle liquor (K062) and debris and failed to comply with the requirements of regulations adopted by the Board under subsections (a) and (c) of Section 22.4 of the Act.

Illinois Emergency Management Agency

Incident Number

Notify: ILLINOIS EMERGENCY MANAGEMENT AGENCY

22222 X	~~~~~
1 - 1 - 1 - 1	REPORT
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)	I - 800 / 782 - 7860 or 217 / 78	
,		A V
1.	Call back phone#: 309/688-0760	14. On Scene Contact: DENNIS FORTER
2.	Cali pack phones: 3097000-0700	On Scene Phone#: 309/565-4281
3.	Caller represents: PROBIA DISPOSAL COMPANY	15. No. injured: NONE [] Haz-max related Where taken:
4.	Type of incident:[] Fire (Incident Spill	16 Public health risks and/or precautions taken,
	[] Explosion [] Water Involvement [] Gas or Vapor cloud [] Other	including # cyacuated: NONE
e	Incident Location:	moduling in the addition
٠.		
	City RRIMFIKID 61517 M In [] Near	
	County PEORIA	17. Assistance needed from State Agencies:
	Milepost [] RR [] River [] Highway	HONE
	SecTwpRange	
5	Area Involved: [] Highway [] Rail [Fixed Facility	
Vi	[] Waterway [] Air (] Other	
7.	Material (3) Involved: K062/SPENT PICKLE LIQUOR	18. Consimment/cleanup actions and plans:
7.	CONTAMINATED DRAWING COMPOUND	PHYSICALLY REMOVE FROM AREA AND PLACE IN
	[] G25 [] Liquid [] Semi-Solid k] Solid	CONTAINERS FOR PROPER DISPOSAL
	[] Pesticide [] Radioactive	
	CAS #:	
•	UN/NA #:	'
	Is this a 302 (a) Extremely Hazardous Substance?	19: Weather: [] sunny [] overcast [] night
	[] Yes [] No [] Unknown	[] pdy. cldy. [] rain [], snow
	Is this a RCRA Hazardous Waste?	TempF wind dir speed mph.
	[] Yes [] No [] Unknown	
	If Yes, is this a RCRA regulated facility?	20: Responsible Party: Exactoric Street & WERE
	[] Yes (] No	
8.	Container: [] Truck [] RR car [] Drum	Contact person: DALE BENNINGTON
	[] Aboveground tank [] Pipeline	Phone # 309/697-7152
	[] Underground tank [+Other POIL OFF CONTAINER	Mailing address: 7000 W. ADAMS ST, PRORIA,
	container size: 20 YARD CONTAINER	
9.	Amount released: 26,980 LBS	
	Rate of release:	Nodifications: FAX TO LEPA, LIDER, SYM, REC 6
10.	Cause of release: THEROPER ROTLETCATION OF	
	GENERATOR THAT MATERIAL MISTAKRILY SHIPPED	1711-PG TEPA DO
Ll.	Estimated spill extent:	
12	() Square Leaf () Square yards (d) Occurred "Date: 01 / 20 / 98 Time: 1315	
سترط	[X] Discovered Date: 01 / 22 / 98 Time: 1645	
	KONE	
i 5.	Emergency units contacted	S On scene
	(1 Fire	[] Fire
	[] She.iff	[] Sheritt
	(Police	[] Police
	ESDA	[] ESDA
	7.7.4	() Other

NATIONAL RESPONSE CENTER - STATE FAX

** GOVERNMENT USE ONLY ** GOVERNMENT USE ONLY ** GOVERNMENT USE ONLY ** DO NOT RELEASE this information to the public without permission from the National Response Center (G-OPF), U.S. Coast Guard Headquarters, Washington DC 20583-0001 (202) 287-2875.

From: National Response Center

USCG HQ Washington, D. C.

1-800-424-8802

Ta:

IL EPA ERT ATTN: JAMES O'BRIEN

Incident Report # 420928

INCIDENT DESCRIPTION

*Report taken by CIV WINTERS at 18:21 on 22-JAN-98

Incident Type: HIGHWAY

Incident Cause: OPERATOR ERROR

Affacted Area: LANDFILL - DUMPED ON TOP OF OTHER GARBAGE The incident occurred on 20-JAN-98 at 13:15 local time.

Affacted Medium: LAND

SUSPECTED RESPONSIBLE PARTY

Name:

DALE BENNINGTON

Organization: Address:

KEYSTONE STEEL AND WIRE

700 SOUTH WEST ADAMS PEDRIA, IL

Day Phone:

(308)8977152

Tupe of Organization: PRIVATE ENTERPRISE

INCIDENT LOCATION

County: PEORIA

PEORIA CITY/COUNTY LANDFI

LANDFILL

11501 CUTTUNWOOD ROAD BRIMFIELD, IL 61517

RELEASED MATERIAL(S)

CHRIS Code: SFA

Official Material Name: SULFURIC ACID

Also Known As:

Qtu Raleased: 38980 LBS(S)

Oty in Water: 0 NON(S)

SOURCE/CAUSE OF INCIDENT

TRACTOR TRAILER W/ROLLOFF DUMPSTER/CUSTOMER FAILED TO NOTIFY CALLER OF MATERIAL/RELEASED DURING ROUTINE DISPOSAL OF ASSUMED NONHAZARDOUS WASTE

DAMAGE

Injuries:

Fatalities: . Evacuations:

Damages: Air Close:

N

Road Close:

N

REMEDIAL ACTIONS

CALLER REPORTED THAT REMOVAL OF MATERIAL IS PLANNED FOR 23JAN98 SHIPPER

FAILED TO NOTIFY CALLER OF CONTENT OF WASTE MATERIAL

NOTIFICATIONS BY CALLER

EPA: STATE: Y CG: OTHER:

DESC: STATE EPA

NOTIFICATIONS BY NRC

U.S. EPA V

MR SIMES

(312)3532318

NDAA 1ST CLASS BB RPTS FOR IL

(208) 5266344

IL EPA ERT ATTN: JAMES O'BRIEN

(217)7823637

01/22/98

NATIONAL RESPONSE CENTER - STATE*FAX ** GOVERNMENT USE ONLY ** GOVERNMENT USE ONLY ** GOVERNMENT USE ONLY **

ADDITIONAL INFORMATION

NO FURTHER INFORMATION

*** END INCIDENT REPORT # 420028 ***

PLEASE VISIT OUR NEB SITE http://www.nrc.uscg.mil

Printed/Typed Name

(Jack) John R. Skelley

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

19. Discrepancy Indication Space

19. Discrepancy Indication of receipt of hazardous materials-covered by this manifest except as noted in item 19.

Printed/Typed Name

Signature

Month Day Year

Signature

Month Day Year

Date

Printed/Typed Name

Signature

Month Day Year

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1989, Chapter 111 1/2, Section 1004 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to 550 000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

TE OF ILLINOIS P.O. BOX 1927	AL PHUTEUTION AGENCY DIVISION OF SPRINGFIELD, ILLINOIS 62794-9276 (21	7) 782-6761 532-0610 (2458	roved. OMB No.	2050-0039 2050-0039 an the shaded as sederal law, but is	795 b 198
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Merators Name and Wire Co	mpany 11501 West Cottonwo Road-A, Box 99A, B	20	L ID	4 G	O 1 5 B	0 8 2
Nystone Steel Street	STANCE NUMBERS US EPA ID Num	per				r's Phone
OTIA - LEGENCY AND SPILL ASS	6. ILD009848193		D. 809	Transporter's	ID I	ado Phone
	11.0009848197 US EPA ID Num	per	F (1) 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Transport	er's Phone
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Transporter 2 Comp	10. US EPA ID Nur		The Control of the Control	ity's Phone		
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d.		251102-201	27-21 K	Handling Coo In Item #14		
Transpirals:	Listed Above					
3. Additional Description for Materials	dag Compound & Refuse		-	14.00		
K062 Contaminated Dra	wing Compound & Refuse				Description of the Control of the Co	Secure Contract Contract
WMDS 7 10 7		<u> </u>			e ^r	
15. Special Handling Instructions and	Additional Information					
15. Special Handling Instructions and			. /	1250	1/5	
		and fully and	d accurately	described abo	y highway	
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16. GENERATOR'S CERTIFICATION	ssified, packed, marked, and labellations.	the volume and	toxicity of the	vaste generale urrently availab	e to me which to to minimize my	waste generation ar
according to applicable unto	that I have a progressing method of treat	-corretor: I hav	e made a g	OOG terns enoug		Month Day
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1	3. Generator's Name and Mailing Address	*	ition If Different		A	linois Manifest Do	888 FEE F
	Keystone Steel & Wire 7000 SW Adams Street	Box.	V. Cottonwood Road 99A, RR #2	~A	B. II	linois	Start Commence of the
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	WMDS #16749	il de la		1 - 12			75 W.
	15. Special Handling Instructions and Additional Info				337		
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$\ \ $							191
	NAERG #171	202	8				
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	according to applicable international and national go	overnment regul	ations.	The state of the state of	1.0		
	If I am a large quantity generator, I certify that I have selected and that I have selected and future threat to human health and the environment select the best waste management method that is	d the practicable ent; OR, if I are	e method of treatment, storage, on a small quantity generator. I have	disposal cu e made a co	rrently od faith	availablé to me whi effort to minimize	ch minimizes the
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PDC Transportation Transporter 2 Company Name		8.	US E	PA ID Number		E. Illinoi	s Transporter	s ID	
Designated Facility Name and Site Peoria Disposal Comp 4349 Southport Road Peoria, IL 61615		10.	US E	PA ID Number		G. Illinoi Facili ID H. Facil	ity's 14	3 8	ansporter's Pho
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WASTE MANIFEST	ILP200001	794		of			
3. Generator's Name and Mailing Address		n If Different		A. FILLING	Manifest D	COMEN	t Number
Keystone Steel & Wire 7000 SW Adams Street	11501 W. Box 9	Cottonwood Road- 9A, RR #2	-A	B. Jilino	is	<u> </u>	6 FEE I
4. 24 HOUR EMERGENCY AND SPILL ASSIS	STANCE NUMBERS	d, IL 61517	7070	Gen	erator's		
5. Transporter 1 Company Name	6.	US EPA ID Number	<u>u</u>	C. Illino	ois Transporte	r's ID	
PDC Transportation		ILD009848193			*674-51		
'7. Transporter 2 Company Name	8. 1	US EPA ID Number	••	E. Illino	is Transporte	r's ID	St. 1
9. Designated Facility Name and Site Address	10.	US EPA ID Number		F. (```Xin∏	ransporter
Peoria Disposal Company #		US EFA ID NUMBE		- Faci	lity's		
4349 Southport Road	•			H. Faci	lity's Phone	13.8	
Peoria, IL 61615		LD000805812		(30	99676-48	3 93	TY POLIS
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UNIFORM HAZARDOUS , WASTE MANIFEST	1. Generator's U ILP2000	25 CFA 1D 140.	cument No.	_	f 1 require	ed by Feder law.	e shaded area railaw, but is red
3. Generator's Name and Mailing Address		ation If Different		A. Illin	ois Manifest [388	7 FEE PAIL
Keystone Steel & Wire	11501 Box	W. Cottonwood Road 99A. RR #2	-A	B. Illin		<u> </u>	IF APPLI
7000 SW Adams Street Peoria IL 61607 4. 24 HOUR EMERGENCY AND SPILL ASSI	Brimf1	eld, II 61517 -	1020	Ge	nerator's 1	4, 3, 0	1, 5, 3,
5. Transporter 1 Company Name	6.		r	C. Illin	ois Transporte	ers ID 🧦	0-1
PDC Transportation	•	ILD009848193		D: 30	9-674-51	.76 ⊜⊤₁	ransporter's F
7. Transporter 2 Company Name	8.	US EPA ID Number	г		ols Transport		
O Designated Section Name and Site Address	10.	US EPA ID Number		F. (G. Illir		Tı	ransporter's F
9. Designated Facility Name and Site Address Peoria Disposal Company	_	. US EPA ID Number	ı		cility's 1,	4, 3, 8	. 1. 2. 0.
4349 Southport Road	-	TT T 0.000005010			cility's Phone		
Peoria, IL 61615		ILD000805812		(3	09) 676-4	893	
11. US DOT Description (Including Proper Ship	oping Name, Hazai	rd Class, and ID Number)	12. Conta	Type	13. Total Quantity	14. Unit Wt/Vol	: Waste
a. "RQ" Hazardous Waste Sol:	(4 = 0 =	9 NA 2077					EPA HW N
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J. Additional Description for Materials Listed A				K. Ha	ndling Codes tem #14	for Waste	
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K062 Contaminated Drawin	g Compound	and Refuse		K Ha	ndling Codes tem #14	for Waste	
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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BUREAU OF LAND/FIELD OPERATIONS SECTION RCRA INSPECTION REPORT

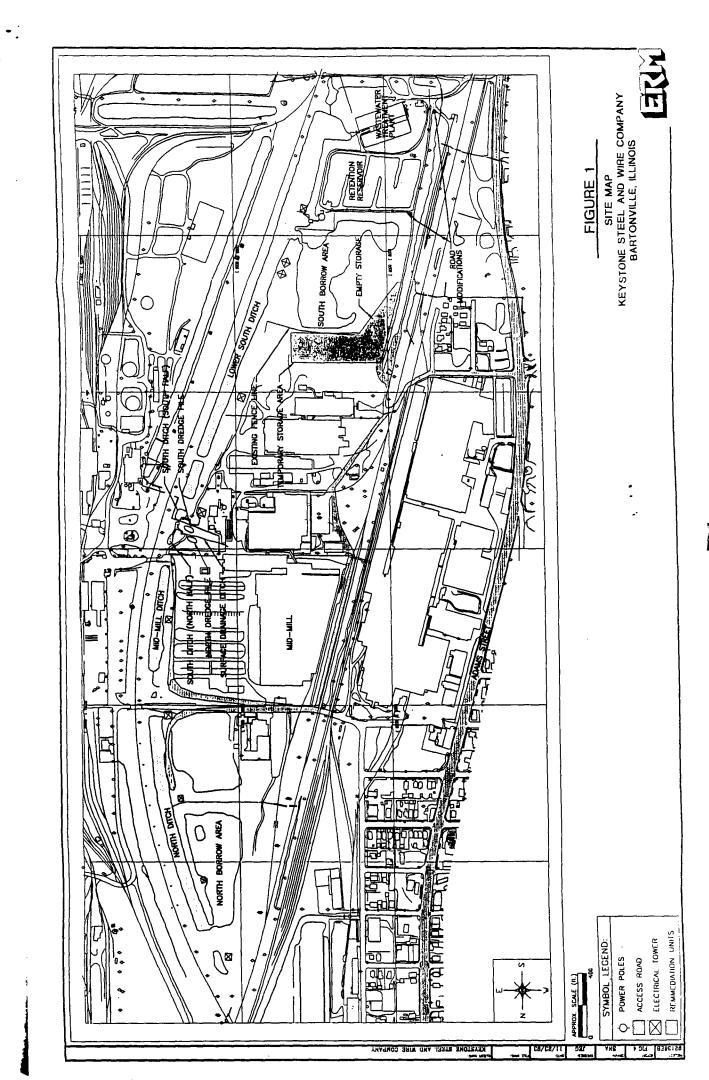
GENERAL FACILITY INFORMATION

USEPA ID #: ILD 000714981			IEPA ID #: 14	3005000	1
Facility Name: Keystone Steel + Wi	ne Co.			Phone #: 30	9/697-7020
Location: 7000 S. Adams				County: P	7
City: Peorie		State: 1 L		Zip Code: 6	1641
Region: 3	Inspection Date:	07/30/199	6	Time: 9:1:	
Weather:				4:	50 pm
	TYPE OF	FACILITY			
Notified As: 6			Regulated As:	G/ST	
	TYPE OF IN	ISPECTION	1		
CEI: X CME/O&M: CSI: NER:	F/U to:/e	,/ CC: P	PIF: CVI:	CSE: Ot	ther:
NOTIFICA	TION INFOR	MATION (EPA 8700-12	2)	
Notification Date: 08 / 18 / 80 (initial)				1 1	(subsequent)
PART A PE	ERMIT INFO	RMATION	(EPA 3510-	3)	•
Part A Date: 11 / 19 / 80	Amended:	1 . 1		Withdraw	n: 0/ 28/92
PAR	T B PERMIT	'INFORMA	TION		
Part B Submitted/Issued (circle one):	1				
	ACTIVE ENF	ORCEME	T		
Has the company been referred to: USEPA: O	1 /08/85 IA	\GO: / #	County Sta	ate's Attorney:	1 1
ACTI	VE ENFORC	EMENT O	RDERS		
CACO: / /	CAFO: /	1	Fee	deral Court Orde	er: / /
Consent Decree: 07 /29 /9 3	IPCB Order:	1 1	Sta	te Court Order:	1 1
TSD FAC	CILITY AC'	TIVITY S	UMMARY	7	
Activity by Process Code On Part A? On Part B?	Activity ever	Closed?	Being done during insp?	Exempt per 35 IAC Sec:	On Annual Report 19 15 19 44 19 9 3

Activity by Process Code	On Part A?	On Past B?	Activity ever done?	Closed?	Being done during insp?	Exempt per 35 IAC Sec:	On Annu Report 19 15 19 14 1	;
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3 ****	OWNER					O	PERATOR		
Name: K	Leystone Consolida	ted	Industri	25	Name:	Same a	a facility		
ress:	4835 LBJ Free	204	Suite 3	00	Addre	ss:			
City: D				City:					
State: T	' X		Zip Code: 7	5234	State:		Zip Code:		
Phone #:					Phone	#:			
PERSO	SON(S) INTERVIEWED TITLE					PHONE #			
Dales	Bennington					Engr	309/697-7020		
Bob n	niller			mar of Engineering	+ M	aintenence	" (1		
Deve !	Semelroth	-: · · ·		Design Engineer	د 		11		
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INSPEC	CTION PARTICIPAN	NT(S))	AGENCY/DIVISIO	N		PHONE #		
John	Tripses		-	IEPA/DLPC			309/693-5462		
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	el Cunningham			USEPA/OFfice o			312/886-4464		
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John	Tripses			IEPA/DLPC			309/693-5462	<u>,</u>	
	SUM	MA	RY OF	APPARENT	VIO	LATIO	NS		
AREA	SECTION	X	AREA	SECTION	Х	AREA	SECTION	X	
DOR	703.1216	×	OMR	725.17366	X				
DOR	703.121(W)	×	DMR	725.174(2)	X				
DOR	703.150(a)	X	GLB	728.1076				\bot	
GGR	722.111			728.107 (a)(1) or					
GGR	722.112(c)		GLB	728.107(2)(2)					
GMR	722.120 (a)		-	21(e)					
GMR	722.120CW			21(5)					
GMR	722.121 (a)			21Ci)					
GMR	722.122								
GMR	722.123(a)								
GMR	722.123(6)								
PT	722. 134 (4)(2)								
	722.134(0)(4)								
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Disposition Waste Manifested Generation | Shipment Narralice Narvallie Narrabin Narralin Uarray w Narvalie USEPA ID #: XLD00071488 Nave Navve Narra Narke していると Navver Narra EPA ID #: 143005000 Rate 5 See S Sex S 500 5 On Part A On Annual Report | Amount See See S On-Site See S 5 Se S See Navadio Namelie DISPOSITION FORM 1993 1994 1995 2 2 > > > フ > 2 3 2 3 2 for Years: 2 2 2 2 2 2 > > See Šę 2 2 2 7 2 (3510-3)App17 Notification? (8700-12) WASTE 9000 # **%**I F002 Kolo USEPA 13001 F003 F005 2000 F007 5007 Kor 800 るこ 86 2003 000 **F**002 000 0000 0000 0000 Dool 1000 000 0003 Analysis Date of Last 0018 0035 0036 45tone Steel + Wive Co. Clary Generating Manufacturity Cleaning Process Cleaning Claning Painting Cleaning Claning Cleaning Painding Claning Cleaning Unknow Claning Cleanup Spill Manuel i; 5400 Stee Wast Flammash 1.1 Trichloset wasta Patroloom Trichloro coluper 111/2011:0 Wast Mineral chloroethy loup richlowethan Non Recliper Oil/Ribolosm Trichlororthan Water + 1,1,1 To Sodion Holoside FacilityName Inspection D Wast Latex Sasolim/O: Dry Mixture Redinactic Spand Pickin wast fain Spirits + 0! Waste Name Kerosen + Arc Dist Madevini するの とる Nagt K Tedya-Liguid



NARRATIVE

Keystone Steel & Wire Company (Keystone) was inspected on July 30, 1996 from 9:15 a.m. to 4:50 p.m. The inspection was an LDF/CEI. The inspection consisted of an interview with facility personnel, a review of facility documents, and a site tour. The following persons participated in the inspection:

Bob Miller . . Manager of Engineering & Maintenance

Dale Bennington . . Manager of Energy & Environmental

Engineering

Dave Semelroth . . Design Engineer

Elton Breland . . ERM North Central, Inc. John Greifzu . . ERM North Central, Inc.

Michael Cunningham . . USEPA

Tim Nebergall . . IEPA

Kristine Dzurison . . IEPA

John Tripses . . IEPA (author)

Keystone manufactures steel bars, rods, fence, posts, and nails. During the manufacturing processes, the following hazardous wastes are generated.

Waste Petroleum Naphtha - D001, D006, D008, D018, D035, D039, D040

This waste is generated when dies are cleaned. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327	1,045 gal	880 gal	770 gal
Safety-Kleen ILD093862811	728 gal	877 gal	1,484 gal

The 1995 annual report did not list all the hazardous waste codes for this waste. The manifests listed D001, D006, D008, D018, D035, D039, D040 but the annual report listed only D001. In 1996, Keystone started shipping this waste to Pollution Control Industries (IND000646943).

Tetrachloroethylene - F002

This waste is generated during cleaning. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327			165 gal

Water & 1,1,1 Trichloroethylene - F002

This waste is generated during cleaning. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Pollution Control Industries IND000646943			495 gal

Waste Paint Related Material - D001, F003, F005

This waste is generated from painting in the wire mill. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327	220 gal	165 gal	165 gal

Waste Latex Paint - D001, D036

This waste is generated in the galvanizing line. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Chief Supply Co. OKD089761290		990 gal	
Clayton Chemical Co. ILD066918327	990 gal		
Pollution Control Industries IND000646943			154 gal

Waste Flammable Liquid - D001

This waste is a mixture of gasoline and diesel fuel mixture. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327			275 gal

Waste Mineral Spirits & Oil - D001

This waste is generated during parts cleaning. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327		275 gal	

Gasoline/Oil Dry Mix - D001

This waste is generated when gasoline spills in the autoshop are cleaned up. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327		55 gal	

Waste Sodium Hydroxide (D002)

This waste was a soap that was used on a trial basis to clean nails. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327		55 gal	

Waste Perchloroethylene/1,1,1 Trichloroethane - F002, D001

This waste is generated during cleaning. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327		165 gal	

1,1,1 Trichloroethane - F002

The waste was generated during degreasing. The waste is no longer generated. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327	21,340 gal		
Waste Research & Reclamation WID990829475	1,211 gal		

Kerosene & Oil - D001

This waste was generated during parts cleaning and was discontinued. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327	330 gal		

Oil/Petroleum Naphtha - D001

This waste is generated in cleaning. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327	605 gal		165 gal

Oil Dry/1,1,1 Trichloroethane - F002

This waste is generated during spill cleanups. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327	55 gal		

Arc Dust (Non-Radioactive) - K061

This waste is generated when metal is melted in the arc shop. The roof of the arc shop has a ridge vent that is connected to a bag house. An induced draft air system draws the arc dust into the vent system and into the bag house. Photograph 8 shows the roll-off boxes used to accumulate the arc dust. Photograph 14 shows the area where roll-off boxes are placed after they are moved from the arc shop and placed prior to shipment off-site. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Peoria Disposal Co. ILD000805812	17,686,237 gal	18,644,640 gal	20,606,022 gal

The annual reports listed 420,000 gallons as generated in 1993 and stored and listed 1,308,000 gallons as generated prior to 1993 and stored. The stored waste was initially regulated by the Illinois Department of Nuclear Safety (IDNS) as radioactive and could not be shipped off-site. In 1993, IDNS determined that any of the waste that was less than 2 pCi/g was not regulated as radioactive and could be shipped off-site. The next section contains additional information about the radioactive arc dust.

Arc Dust (Radioactive) - K061

This waste was generated in 1992 and 1993 when a radioactive source was melted with scrap metal in the arc shop. On December 5, 1992, a shipment of arc dust was rejected by Horsehead Research

and Development (ILD040891368) because it was radioactive. Keystone was unable to ship any of the arc dust off-site because of the radioactivity. The dust was contaminated with cesium-137. Keystone notified IDNS and the IEPA of the problem. Keystone continued to operate and continued to produce radioactive arc dust. The arc dust was placed in roll-off boxes. Keystone shut down for two weeks at the end of December 1992 and attempted to clean the system of the radioactive dust. When they resumed operation, the dust was still radioactive. In addition to placing the waste in 51 roll-off boxes, the dust was placed in two tanks. Keystone obtained the necessary permit (License No. IL-01510-01) from IDNS for storing the radioactive arc dust.

On August 5, 1993, IDNS wrote Keystone and allowed all arc dust produced after the cleanup activities and containing cesium-137 concentrations equal to or less than 2 pCi/g to be shipped off-site as a nonradioactive. Keystone has removed the waste from the two tanks. Photographs 9, 10, 11, and 12 show the two tanks. (Photographs 10, 11, and 12 did not develop and the negative appeared to be light fogged.) Photographs 13 shows one of the areas where containers were stored. All radioactive arc dust has been shipped off-site.

Keystone did not have a RCRA permit to store the radioactive arc dust in tanks or containers (roll-off-boxes). On June 30, 1995, Keystone submitted a RCRA closure plan for the tanks and container storage areas where the containers were removed. The closure plan was approved on September 28, 1995 (Log No. C-754). A closure certification was submitted to the Agency on January 3, 1996. The closure certification is being reviewed by Permits Section.

According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Envirocare of Utah UTD982598898		1,751,281 lbs	770,440 lbs

In 1992 and 1993, Keystone generated 2,400,000.9 lbs of radioactive arc dust. The 1994 annual report listed 648719.4 lbs in storage.

Emission Control Bags (Radioactive) - K061

This waste is the bags from the baghouse that were radioactive. 71,360 lbs were generated and stored in 1993 but were not listed on the annual report. In 1994, the entire waste was shipped to Envirocare of Utah (UTD982598898).

Spent Pickle Liquor - K062

This waste is generated in the Mid Mill and in the Wire Mill. When the acid used for pickling is dirty, it is pumped from the pickling tanks to a 40,000-gallon spent acid tank. From the spent acid tank the acid is pumped to a 10,000-gallon treating tank. In the treating tank, the acid is chilled to 32 °F. From the treating tank, the acid is pumped through a centrifuge. Ferrous sulfate heptahydrate crystals are separated from the acid. The acid goes to the 30,000-gallon recovered acid tank and from there back to the pickling tanks. The crystals are sold to another company. Photograph 23 shows the pile of ferrous heptahydrate crystals.

When the acid is so dirty it can no longer be cleaned and when the pickling tanks are cleaned out, the spent pickle liquor flows to a holding tank in the Mid Mill building. There the pH is controlled by adding lime. From there, it flows through a pipe to the wastewater treatment plant where it is further treated. The wastewater from the treatment plant is discharged to the Illinois River under an NPDES permit. The wastewater treatment plant is totally enclosed and permitted by the Division of Water Pollution Control and, therefore, is exempt from regulation under RCRA by Section 703.123(d). The sludge from the treatment plant is stored in two surface impoundments. The sludge (formerly K063) has been delisted.

The spent pickle liquor used to be mixed with nonhazardous wastewaters and pumped into the South Ditch (see photographs 27 and 30) and the Mid Mill Ditch (see photograph 31). The Mid Mill Ditch flows into the South Ditch. From the lower half of the South Ditch (see photograph 26), the mixture was pumped to the 24-Hour Retention Basin. These ditches and the North Ditch (see photographs 1, 5, and 6) are regulated as surface impoundments. In addition, the South Ditch was dredged. The sludge was placed in two waste piles west of the South Ditch (see photographs 28 and 29). Keystone Steel & Wire Company does not have a RCRA permit for storage of spent pickle liquor in surface impoundments or in waste piles. An enforcement action was filed against Keystone Steel & Wire Company quit pumping spent pickle liquor into the ditches on October 31, 1986. Nonhazardous wastewaters are still pumped into the South Ditch and the Mid Mill Ditch.

The surface impoundments and waste piles are undergoing a RCRA closure that is estimated to take 11 years and is part of a consent decree (No. 93-CH-000103). The closure of the 24-Hour Retention Basin has been certified. Keystone is working on the closure of the North Ditch. Photographs 1, 2, 3, 4, 5, 6 and 7 show the closure activities at the North Ditch. The excavators shown in photographs 1 and 5 place the sediment from the ditch into a screen shown in photograph 2. Debris is screened out and placed into a roll-off box. Photograph 7 shows a roll-off box containing the debris. The sediment is conveyed from the screen into a mixer where it is mixed with lime. Photograph 3 shows the mixture being loaded into roll-off boxes. Photograph 4 shows the area where the roll-off boxes are sampled. Photographs 32 and 33 show the area where roll-off boxes are accumulated prior to shipment off-site. If the mixture meets the delisting criteria, it is shipped off-

site as nonhazardous waste. If not, it is returned to the ditch for additional treatment. Keystone has shipped 17,500 tons of treated residues from the North Ditch to Peoria City County Landfill (1438160002). ERM North Central is overseeing the closure activities for Keystone. Keystone and ERM North Central hope to have the North Ditch closure activities completed this year.

The debris from the ditch is shipped off-site as K062 to Peoria Disposal Company (1438120003 and ILD000805812). Initially, the manifests listed the waste as "K062: Spent pickle liquor generated by the steel finishing operations of facilities within the iron and steel industries (SIC codes 331 & 332)." Peoria Disposal Company wanted the waste listed as "K062: contaminated w/PPE, HDPE, & slag" because it fit the permit (000390). Shipments of this waste started on July 16, 1996 and there have been approximately 45. Seven shipments were returned to Keystone for freestanding water. The water was drained into an untreated ditch and the waste was remanifested off-site.

In April 1996, sediment from the Mid Mill Ditch was treated but did not pass the delisting test. The waste was shipped off-site as hazardous waste because Keystone did not want to do additional testing on each roll-off box. 115 containers and 1,855 tons were shipped off-site to Peoria Disposal Company (1438120003 and ILD000805812).

On June 5, 1995, Keystone had a spill of pickle liquor from the acid recovery building. A copy of the Illinois Emergency Management Agency incident report is attached. The incident number is 951191. Keystone was told by the author during an inspection that was conducted on June 6, 1995 that any waste that was cleaned up from the spill would have to be disposed of as a hazardous waste (K062). All contaminated soil from the clean-up would be a hazardous waste because of the following reasons:

- 1. The spilled pickle liquor is K062 spent pickle liquor generated by steel finishing operations from facilities within the iron and steel industry. (Section 721.132).
- 2. The pickle liquor is "spent material" because it has been used and as a result of contamination can no longer serve the purpose for which it was produced. (Section 721.101(c)(1)).
- 3. The soil and spent pickle liquor mixture is a hazardous waste because it is a mixture of a solid waste and a hazardous waste that is listed in Subpart D. (Section 721.103(a)(2)(D)).

Keystone hired Peoria Disposal Company to clean up the spill. The soil was neutralized and shipped as nonhazardous waste to Peoria City-County Landfill. A copy of Keystone's report to Emergency Response Unit (including copies of the manifests) is attached. Keystone sent the waste from the clean-up off-site as a nonhazardous waste to a nonhazardous waste landfill. The material should have been sent off-site as K062 to a hazardous waste landfill. Photograph 24 shows the area where

the spill occurred.

Photographs 15, 16, 17, and 18 show the 90-day accumulation area in the Mid Mill Building. There were four barrels of waste paint and thinner, six barrels of waste paint, two barrels of mineral spirits, one barrel of water & oil (nonhazardous), five barrels of PCB waste (two with open top and one with a hole in the side), and five barrels (four in overpacks) of unknown waste. Neither Mr. Bennington nor Mr. Semelroth knew what was in the five barrels of unknown waste.

On June 28, 1996, Keystone spilled some acid (IEMA Incident No. 960930). The soil was cleaned up and placed in a roll-off box. Mr. Bennington said that Keystone was going to handle the soil as a hazardous waste (D002). The roll-off box was labeled "Hazardous Waste" but did not have an accumulation date.

The training plan was last revised on February 17, 1995. The last personnel training took place in March and April 1995. The last new employee personnel training took place on May 1, 1995. Keystone is working on revising the training program to combing RCRA and OSHA training. The training will be given this fall.

During the review of documents and site tour, the following apparent violations were observed:

- Section 703.121(a) of the Regulations Keystone stored spent pickle liquor (K062) in surface impoundments and radioactive arc dust (K061) in containers and tanks without a RCRA permit. Keystone failed to comply with the requirements of Section 722.134(a) and no longer qualifies for the exemption from RCRA permitting for generators who accumulate waste on-site for 90 days of less.
- Section 703.121(b) of the Regulations Keystone stored spent pickle liquor (K062) in surface impoundments and radioactive arc dust (K061) in containers and tanks without a RCRA permit. Keystone failed to comply with the requirements of Section 722.134(a) and no longer qualifies for the exemption from RCRA permitting for generators who accumulate waste on-site for 90 days of less.
- Section 703.150(a) of the Regulations Keystone stored spent pickle liquor (K062) in surface impoundments without a Part A permit.
- Section 722.111 of the Regulations Keystone failed to make the correct hazardous waste determination of the waste material from the clean-up of the spent pickle liquor (K062). Keystone failed to make a waste determination of the five barrels of unknown waste in the hazardous waste accumulation area in the Mid Mill Building.
- Section 722.112(c) of the Regulations Keystone sent the hazardous waste from the spill and

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- clean-up of the spent pickle liquor (K062) to a disposal facility that did not have a USEPA Identification Number.
- Section 722.120(a) of the Regulations Keystone sent the hazardous waste from the spill and clean-up of the spent pickle liquor (K062) to a disposal facility without using a manifest.
- Section 722.120(b) of the Regulations Keystone sent the hazardous waste from the spill and clean-up of the spent pickle liquor (K062) off-site without designating on the manifest one facility which is permitted to handle the waste.
- Section 722.121(a) of the Regulations Keystone sent the hazardous waste from the spill and clean-up of the spent pickle liquor (K062) off-site without using the manifest supplied by the Agency.
- Section 722.122 of the Regulations Keystone sent the hazardous waste from the spill and clean-up of the spent pickle liquor (K062) off-site without using the manifest supplied by the Agency.
- Section 722.123(a) of the Regulations Keystone sent the hazardous waste from the spill and clean-up of the spent pickle liquor (K062) off-site without signatures on the manifest, without retaining one copy of the manifest, and without sending a copy of the manifest to the Agency.
- Section 722.123(b) Keystone sent the hazardous waste from the spill and clean-up of the spent pickle liquor (K062) off-site without giving copies of the manifest to the transporter.
- Section 722.134(a)(2) of the Regulations Keystone failed to label with an accumulation date the container of hazardous waste from the clean-up of the June 28, 1996 acid spill.
- Section 722.134(a)(4) of the Regulations Keystone failed to comply with the requirements of Section 725.131. By sending the hazardous waste from the spill and clean-up of the spent pickle liquor (K062) to a nonhazardous waste landfill (Peoria City-County Landfill), Keystone failed to avoid sudden planned or unplanned releases of hazardous waste to the environment.
- Section 722.141(a) of the Regulations Keystone failed to include on its 1995 annual report the shipments off-site of hazardous waste from the spill and clean-up of spent pickle liquor (K062). Keystone failed to include on its 1995 annual report all the waste

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- codes for the Waste Petroleum Naphtha. The manifests listed D001, D006, D008, D018, D035, D039, D040 but the annual report listed only D001.
- Section 725.113(b) of the Regulations Keystone did not have a written waste analysis plan.
- Section 725.131 of the Regulations By sending the hazardous waste from the spill and clean-up of the spent pickle liquor (K062) to a nonhazardous waste landfill (Peoria City-County Landfill), Keystone failed to avoid sudden planned or unplanned releases of hazardous waste to the environment.
- Section 725.173(b) of the Regulations The operating record did not contain the location and amount of the pickle liquor (K062) in storage.
- Section 725.174(a) of the Regulations The waste analysis plan was not available for inspection.
- Section 728.107(a) of the Regulations Keystone failed to determine if the hazardous wastegenerated from the spill and clean-up of the spent pickle liquor (K062) was restricted from land disposal.
- Section 728.107(a)(1) or Section 728.107(a)(2) of the Regulations Keystone failed to notify the disposal facility if the hazardous waste generated from the spill and clean-up of the spent pickle liquor (K062) did or did not meet the treatment standard.
- Section 21(e) of the Act Keystone disposed of the hazardous waste generated from the spill and clean-up of spent pickle liquor (K062) at a facility (Peoria City-County Landfill) that did not have a permit to accept that waste.
- Section 21(f) of the Act Keystone stored spent pickle liquor (K062) in surface impoundments and radioactive arc dust (K061) in containers and tanks without a RCRA permit. Keystone failed to comply with the requirements of Section 722.134(a) and no longer qualifies for the exemption from RCRA permitting for generators who accumulate waste on-site for 90 days of less.
- Section 21(i) of the Act Keystone generated hazardous waste from the spill and clean-up of spent pickle liquor (K062) and failed to comply with the requirements of regulations adopted by the Board under subsections (a) and (c) of Section 22.4 of the Act.

The apparent violations of Section 703.150(a), Section 725.113(b), and Section 725.173(b) [originally cited as Section 725.173] were originally observed during an inspection conducted on

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February 22, 1985 and cited in a Compliance Inquiry Letter dated April 15, 1985. The apparent violations of Section 703.121(a) and Section 703.121(b) [originally cited as Section 703.121] were originally observed during an inspection conducted on February 23, 1988 and cited in a Compliance Inquiry Letter as dated April 15, 1988. The apparent violation of Section 725.174(a) was originally observed during an inspection conducted on November 28, 1988 and cited in a Compliance inquiry letter dated March 29, 1989.

The apparent violations of Section 722.111, Section 722.12(c), Section 722.120(a), Section 722.120(b), Section 722.121(a), Section 722.122, Section 722.123(a), Section 722.123(b), Section 722.134(a)(2), Section 722.134(a)(4), Section 722.141(a), Section 725.131, Section 728.107(a), Section 728.107(a)(1) or Section 728.107(a)(2), Section 21(e), Section 21(f), and Section 21(i) are new apparent violations based on this inspection.

Apparent violations of Section 725.291(a) and Section 725.293(a) were first observed during an inspection conducted on September 23, 1993 and cited in a Compliance Inquiry Letter dated November 5, 1993 are now resolved. Apparent violations of Section 725.115(a), Section 725.115(d), and Section 725.274 first observed during an inspection conducted on June 6, 1995 and cited in a Compliance Inquiry Letter dated October 31, 1995 and are now resolved. All these apparent violations are resolved because Keystone in no longer storing the radioactive arc dust (K061) in containers and tanks. Keystone still has to complete RCRA closure of these units.

Keystone appears to be complying with the latest court order for the closure of the surface impoundments.

JGT

c:\land\key\960730bx.wpd



143005001

June 23, 1995

Illinois Environmental Protection Agency Emergency Response Unit, Mail Drop #29 P.O. Box 19276 2200 Churchill Rd. Springfield, Illinois 62794-9276 ATTN: Charles W. Brutlag RECEIVED

IEPA
Office of Chemical Safety

RE: Keystone Steel & Wire Co. K062 Spill Report for Incident #951191 occurring on 6-5-95

Dear Mr. Brutlag,

In reponse to your June 13, 1995 letter concerning our reported acid spill on June 5, 1995, I am sending you the completed IEMA form and this letter to update your information on this incident.

At approximately 11:20 a.m. on June 5, 1995, a valve ruptured in Keystones Acid Recovery Building causing a release of approximately 300 gallons of high-iron spent acid (K062) outside the building containment to a small area east and south of the building. Keystone responded at 11:30 a.m. by sandbagging around the storm drain outside the building and spreading lime over the affected area to neutralize the acid. The Emergency Coordinator (Jack Skelley 697-7538) was notified at 11:40 a.m. and arrived on-scene at 11:47 a.m. PDC Response was called to cleanup the acid spill and take over the emergency response effort. The area was secured by Keystone Security and remains secured until confirmation sample analyses are completed. No injuries were recorded to either Keystone or PDC personnel. The following is the information required by the Keystone Contingency Plan for Hazardous Waste Storage:

Emergency Coordinator:

(Jack) John R. Skelley (309) 697-7538

Spill location:

Keystone Steel & Wire Co. 7000 SW Adams Street
Peoria, IL 61641

Acid Recovery Building

Date, Time

6-5-95, around 11:20 a.m.

Type of Incident

Ruptured valve on high iron content spent acid line

at Acid Recovery Building.

Material and Quantities involved

high iron content spent sulfuric acid (K062)

300 gallons

Injuries

None

Possible hazards to human health and environment outside Keystone

None, spill affected only Keystone property

Property

Estimated quantity and disposition

96 cu.yds. of soil, lime, and pavement material was removed during cleanup and manifested to PDC.

If there are any questions concerning this incident, please give me a call at (309) 697-7538.

Sincerely,

(Jack) John R. Skelley

Design Engineer

951191in.wpd

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	Illinois Emergency Manager	ment Agency
[]		FIELD REPORT
V	Incident Number 9 5 1	1 9 1 PIELD REPORT
		Dates_06 /05 / 95
	Notify: ILLINOIS EMERGENCY MANAGI	
	1 - 800 / 782 - 7860 or 217 / 78	2 - 7860 Received by: BC
. (Caller: ACK SKRLLEY	14. On Scene Contact: J. SHELLEY
. (Call back phone#: 309/697-7538	On Scene Phone#: 697-7538
, (Caller represents: KEYSTONE STREL AND WIRE	15. No. injured: [] Haz-mat related
	Type of incident:[] Fire [# Leak or Spill	Where taken:
	[] Explosion [] Water Involvement	16. Public health risks and/or precautions taken,
	Gas or Vapor cloud [] Other	including # evacuated: NOWE
	Incident Location:	
	Street 7000 SW ADAMS ST.	
	City PROBLE. 06.5 MIn[] Near	
	County PEORIA 143	17. Assistance needed from State Agencies:
	Milepost [] RR [] River [] Highway	. NORE
	Sec. Twp. Range	
	Area Involved: [] Highway [] Rail [] Fixed Facility	
	Material (s) Involved: SULTHURIC ACID	18. Containment/cleanup actions and plans:
	(Picker Lieusa)	CONTRACTOR BLEED
	[] Gas [] Liquid [] Semi-Solid [] Solid	PDC Response
	Pesticide [] Radioactive	4399 Southport Road
	CAS#: 007664939	Peorie: IL 61615
	UN/NA #:	
	Is this a 302 (a) Extremely Hazardous Substance?	19: Weather: W sunny [] overcast [] night
	Yes [] No [] Unknown	[] ptly. cldy. [] rain [] snow
	Is this a RCRA Hazardous Waste?	Temp. 80-85 F wind dir. SW speed 5-10 mph.
	PYes [] No [] Unknown	
	If Yes, is this a RCRA regulated facility?	20: Responsible Party: 43
	[] Yes No	
•	Container: [] Truck [] RR car [] Drum	Contact person: 41
	[A Aboveground tank [] Pipeline	Phone #
	[] Underground tank [] Other	Mailing address: \$5, 61741-6/691
,	container size: Amount released: 300 GALLONS	
),		
^	Rate of release: VALVE RUFTURE ON TANK Cause of release: VALVE RUFTURE ON TANK	Notifications: PAY: SFM. DFR. LEPA
V.	Cause of refease:	NUCLEURING FAR: SFR. DER. LEEK
1	Estimated spill extent: 3500 so. FT.	
~,	[\frac{1}{2} square feet [] square yards	
2.	[Occurred Date: 06/05/95 Time: 11;15	
	[Discovered Date: 06 / 05 / 95 Time: 1139	
	(A	
•		On scene
3.	Emergency units contacted	
 l3.	Emergency units contacted	- ,
 l3.	[] Fire	[] Fire [] Sheriff
l3.		[] Fire
13.	[] Fire	[] Fire [] Sheriff [] Police



August 3, 1995

Illinois Environmental Protection Agency Emergency Response Unit, Mail Drop #29 P.O. Box 19276 2200 Churchill Rd. Springfield, Illinois 62794-9276 ATTN: Charles W. Brutlag 143 005 0001

RE:

Keystone Steel & Wire Co. K062 Final Spill Report for Incident #951191 occurring on 6-

5-95

Dear Mr. Brutlag,

In response to your June 13, 1995 letter concerning our reported acid spill on June 5, 1995, I am sending you the Final Report for Incident #951191. The information summarized below is the chain of events that took place on June 5, 1995 in response to the K062 spill.

At approximately 11:20 a.m. on June 5, 1995, a valve ruptured in Keystones Acid Recovery Building causing a release of approximately 300 gallons of high-iron spent acid (K062) outside the building containment to a small area east and south of the building. Keystone responded at 11:30 a.m. by sandbagging around the storm drain outside the building and spreading lime over the affected area to neutralize the acid. The Emergency Coordinator (Jack Skelley 697-7538) was notified at 11:40 a.m. and arrived on-scene at 11:47 a.m. PDC Response was called to cleanup the acid spill and take over the emergency response effort. The area was secured by Keystone Security and remains secured until confirmation sample analyses are completed. No injuries were recorded to either Keystone or PDC personnel. The following is the information required by the Keystone Contingency Plan for Hazardous Waste Storage:

Emergency Coordinator:

(Jack) John R. Skelley (309) 697-7538

Spill location:

Keystone Steel & Wire Co. 7000 SW Adams Street Peoria, IL 61641

Acid Recovery Building

Date, Time

6-5-95, around 11:20 a.m.

Type of Incident

Ruptured valve on high iron content spent acid line at Acid Recovery Building.

/9001 807-7020 FAY (2001 607-7400

Material and Quantities involved

high iron content spent sulfuric acid (K062)

300 gallons

Injuries

None

Possible hazards to human health and environment outside Keystone Property

None, spill affected only Keystone property

Estimated quantity and disposition

96 cu.yds. of soil, lime, and pavement material was removed during cleanup and manifested to PDC.

Enclosed are the PDC manifests showing the disposal of the cleanup material, and the PDC laboratory report on the soil samples taken after the cleanup was completed. The sample results show the cleanup successfully removed all the K062 material and the remaining soils are within the IAC 728 Land Disposal Restrictions for K062.

Keystone wishes to consider this matter closed with the receipt of the disposal manifests and the satisfactory laboratory results from the confirmatory soil samples. If there are any questions concerning this incident, please give me a call at (309) 697-7538.

Sincerely,

(Jack) John R. Skelley

Design Engineer

Enclosures

cc:

John Tripses - IEPA

Bob Miller - Keystone

Dale Bennington - Keystone

Jim Zilch - Keystone

951191fl.wpd

468488

P.O. BOX 19276

SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761

8488 26790 FOR SHIPMENT OF HAZARDOUS AND SPECIAL WASTE

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FOR SHIPMENT OF HAZARDOUS

P.O. BOX 19276

SPRINGFIELD, ILLINOIS 82794-9278 (217) 782-8761

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3. Generator's Name and Mailing Address Location If D		*	or Or	u wy worky	
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ASE TYPE (Form designed for use on elite (12-pitch) typewriten) 10 33 4 5 Form 3700-22 (Rev. 6-89) 11 1 Form Approved. OME No. 2050-0889 Experience | Company of the Company 1: Generator's US EPA ID No. Manifest 12 2. Page 10-1 Information in the shaded areas is not provided by Federal law, but is required by Record law. UNIFORM WASTE MANIFEST Outbe 3. Generator's Name and Mailing Address Location If Different Keystone Steel & Wire 7000 S.W. Adams St., Peoria, IL 61641 ... 4. 124 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS 309-697-7538 US EPA ID Number 5. Transporter 1 Company Name 6.0 77.730 009848/93 DISPOSAL EOR IA Transporter 2 Company Name 9. Designated Facility Name and Site Address US EPA ID Number 10 Peoria City/County Landfill Box 99 AA RR #2 . Sand Branchatt Brimfield, IL 61517 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) 45 12. Containers Total Unit Quantity E 131 Non-hazardous Special Waste Neutralized sufuric acid cont'd soil 001. E b. A 0 d. ستراره وعموا دم بهامانيها بديدهماه الاعتاطف بطاهيما الجمعانية 15. Special Handling Instructions and Additional Information அத்த நடிக்கும் மான்று கூறுக்கும் மான்று கூறு மான்று மான்று முறிக்கும் மான்று முறிக்கும் மான்று முறிக்கும் மான்று முறிக்கும் ம " and a district expected transportation, bectment soorage to that a dealer matter of a constant Commission of the entirety generative winst enter the post of the other. The local Research Commission and the property of the contract of the state of the stat 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by, highway and according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford; Month Day Printed/Typed Name SKETLE 17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name " Month Day Year 18. Transporter 2 Acknowledgement of Receipt of Materials Signature arraw and publiques notice of the towned age to Month Day ordite determina de la compania del compania del compania de la compania del compania del compania de la compania del co respects as a s the enclose a color of the fire generation and send copy the control of 19. Discrepancy Indication Space 1998 495 1997 at 1998 April 2005

This Agency is authorized to require, pursuant to Hilnois Revised Statute, 1989, Chapter 111 1/2, Section 1004 and 1021, that this information be automitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to screed \$5,000 per day of violation. Failification of this information may result in a line up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

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20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

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STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

P.Q. BOX 19276

SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761

FOR SHIPMENT OF HAZARDOUS

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STATE OF ILLINOIS

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select the best waste management method that is available to me and that I can afford. Printed/Typed Name 17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name 18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this meditest except at heted lighted Types Name 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this meditest except at heted lighted Types Name 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this meditest except at heted lighted Types Name 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this meditest except at heted Types Name 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this meditest except at heted Types Name	İ	be economically practicable and that I have selected the practicable in and future threat to human health and the environment; OR, if I am a selected the practicable in and future threat to human health and the environment; OR, if I am a selected the practicable in and future threat to human health and the environment; OR, if I am a selected the practicable in and future threat to human health and the environment; OR, if I am a selected the practicable in and future threat to human health and the environment; OR, if I am a selected the practicable in and future threat to human health and the environment; OR, if I am a selected the practicable in the p	nethod of treatment, storage, o small quantity generator, I hav	r disposal curr e made a goo	entry available i faith effort to	to me which ma minimize my wa	nimizes the present aste generation and	
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This Agency is authorized to require, pursuant to litinois Revised Statute, 1989, Chapter 111 1/2, Section 1004 and 1021, that the Mormation be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed \$25,000 per day of violation. Failification of this information may result in a line up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.		KATHY MAX ALIO	JAN P	₩.~.	ANY.	HLOG	MAN	
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I A I	p	ns information may result in a civil penalty against the owner or operator not to a er day of violation and imprisonment up to 5 years. This form has been approved by the Forms is	exceed \$25,000 per day of violati Management Center.	on. Faisification	of this informati	on may result in	a fine up to \$50,000	



PDC Response, Inc.

LETTER OF TRANSMITTAL

Date (), ly 1/ 1995

To: pek

. WE ARE SENDING YOU _	Attached under the following ite	er separate cover via	
Report Proposal Samples	Permits Plan Specific	D.	rawings rints opies
Other: THESE ARE TRANSMITTED	as checked below:		
For approval For review and For your use For your inform For release		Approved as some Approved as not be approved as not be approved as not be approved as not be approved as some approved a	oted
REMARKS: Exclosed acid spill. you have an	Vis the ana Olean car y questions.	lypia for xx 1 Phil Brack	re sulfurio

copy to: file

P.O. Box 9071 Peoriα, IL 61612-9071 24 Hour Hotline: (309) 674-4238





CLIENT	Keystone	
DATE COLLECTED	06-21-95	
DATE RECEIVED	06-21-95	
DATE OF REPORT	07-05-95	
SAMPLE DESCRIPTION	See Below	
P.O. NUMBER	P95-026	
LAB NUMBER	95060640-649	

LAB NUMBER	DESCRIPTION	pH (Units)
95060640	#13	8.3
95060641	#14	7.3
95060642	#15	9.2
95060643	#16	8.7
95060644	#17	8.5
95060645	#18	8.7
95060646	#19	8.9
95060647	#20	8.5
95060648	#21	8.2
95060649	#22	8.3

Carrie leasturg (for)
Inorganies Section Supervisor



	CLIENT	Kevstone	
	DATE COLLECTED	06-21-95	
	DATE RECEIVED	06-21-95	
	DATE OF REPORT	07-05-95	
	SAMPLE DESCRIPTION	#13	
	P.O. NUMBER	P95-026	
	LAB NUMBER	95060640	
LAB NUMBER	ANALYSIS	RESUL	TS
95060640	Presnia	<0.02	mg/l
93060640	Arsenic	0.42	mg/1
	Barium	0.01	mg/1
	<u>Cadmium</u> Chromium	0.01	mq/1
	Lead	0.02	mq/1
		<0.0003	mq/1
	Mercury Selenium	0.01	mg/1
	Silver	<0.001	mg/1
	Arsenic Spike Recovery	111	8
			8
	Barium Shika Decovery	9 /	
	Barium Spike Recovery	<u>97</u>	
	Cadmium Spike Recovery	100	8
	Cadmium Spike Recovery Chromium Spike Recovery	100 100	8
	Cadmium Spike Recovery Chromium Spike Recovery Lead Spike Recovery	100 100 110	95 95
	Cadmium Spike Recovery Chromium Spike Recovery	100 100	8

On November 24, 1992 the U.S. EPA lifted the TCLP requirement for matrix spike bias adjustment for measured values. The rule, however, still requires laboratories to perform matrix spike recovery analysis to validate results.



	CLIENT	Keystone	
	DATE COLLECTED	06-21-95	
	DATE RECEIVED	06-21-95	
	DATE OF REPORT	07-05-95	
	SAMPLE DESCRIPTION	#14	
	P.O. NUMBER	P95-026	
	LAB NUMBER	95060641	
LAB NUMBER	ANALYSIS	RESUL	TS
95060641	Busania	0.03	/1
33000041	Arsenic		mq/l
	Barium	0,12 0,020	mg/1
	<u>Cadmium</u>		mq/1
	Chromium	0.006	mq/l_
	Lead	<0.01	mq/1
	Mercury	<0.0003	mq/1
	Selenium	0.04	mg/1
	Silver	<0.001	mg/l
····	Arsenic Spike Recovery	<u> </u>	- 8
	Barium Spike Recovery	97	- 8
_	Cadmium Spike Recovery	100	8
	Chromium Spike Recovery	100	8
	Lead Spike Recovery	110	8
	Mercury Spike Recovery	97	8
	Selenium Spike Recovery	127	8
	Silver Spike Recovery	105	8

On November 24, 1992 the U.S. EPA lifted the TCLP requirement for matrix spike bias adjustment for measured values. The rule, however, still requires laboratories to perform matrix spike recovery analysis to validate results.

tclp met:vgy



Barium 0.22 mg Cadmium 0.01 mg Chromium 0.005 mg Lead 0.01 mg Mercury <0.0003 mg		CLIENT	Keystone 06-21-95 06-21-95 07-05-95 #15	
95060642 Arsenic <0.02 mg				
95060642 Arsenic <0.02 mg				
Barium 0.22 mg Cadmium 0.01 mg Chromium 0.005 mg Lead 0.01 mg Mercury <0.0003 mg	LAB NUMBER	ANALYSIS	RESUL	TS
Cadmium 0.01 mg Chromium 0.005 mg Lead 0.01 mg Mercury <0.0003 mg Selenium 0.06 mg Silver <0.001 mg	95060642	· · · · · · · · · · · · · · · · · · ·		mg/l
Chromium 0.005 mg Lead 0.01 mg Mercury <0.0003 mg				<u>mg/1</u>
Lead 0.01 mg Mercury <0.0003 mg Selenium 0.06 mg Silver <0.001 mg	· · · · · · · · · · · · · · · · · · ·			mq/l
Mercury <0.0003 mg Selenium 0.06 mg Silver <0.001 mg				ma/1
Selenium 0.06 mg Silver <0.001 mg				mg/l
				mg/1
				mg/1
Argenia Chika Dagayany 111 9	···	Arsenic Spike Recovery	111	- 100/T
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On November 24, 1992 the U.S. EPA lifted the TCLP requirement for matrix spike bias adjustment for measured values. The rule, however, still requires laboratories to perform matrix spike recovery analysis to validate results.

Selenium Spike Recovery Silver Spike Recovery



CLIENT	Keystone	
DATE COLLECTED	06-21-95	
DATE RECEIVED	06-21-95	
DATE OF REPORT	07-05-95	
SAMPLE DESCRIPTION	#16	
P.O. NUMBER	P95-026	
LAB NUMBER	95060643	
	7700010	
17.0 NO.000N		

LAB NUMBER	ANALYSIS	RESUL	RESULTS		
95060643	Arsenic	<0.02	mq/		
	Barium	0.41	mg/:		
	Cadmium	0.009	mq/:		
	Chromium	0.006	mq/:		
	Lead	<0.01	mq/		
	Mercury	<0.0003	ma/		
	Selenium	0.03	mg/		
	Silver	<0.001	mq/		
	Arsenic Spike Recovery	111	8		
	Barium Spike Recovery	97	ક		
	Cadmium Spike Recovery	_ 100	- 2		
	Chromium Spike Recovery	100	8		
	Lead Spike Recovery	110	8		
	Mercury Spike Recovery	97	8		
	Selenium Spike Recovery	127	8		
	Silver Spike Recovery	105	8		

On November 24, 1992 the U.S. EPA lifted the TCLP requirement for matrix spike bias adjustment for measured values. The rule, however, still requires laboratories to perform matrix spike recovery analysis to validate results.



	CLIENT	Kevstone	
	DATE COLLECTED	06-21-95	
	DATE RECEIVED	06-21-95	
	DATE OF REPORT	07-05-95	
	SAMPLE DESCRIPTION	#17	
	P.O. NUMBER	P95-026	
	LAB NUMBER	95060644	
LAB NUMBER	ANALYSIS	RESUL	.TS
95060644	Arsenic	<0.02	mg/l
700000	Barium	0.26	mq/1
	Cadmium	0.000	mq/1
	Chromium	0.003	mq/l
	Lead	<0.01	mg/l
	Mercury	<0.0003	mg/l
	Selenium	0.04	mg/l
	Silver	<0.001	mq/l
	Arsenic Spike Recovery		
	Barium Spike Recovery	97	. 8
	Cadmium Spike Recovery	100	8
	Chromium Spike Recovery		8
	Lead Spike Recovery		8
	Mercury Spike Recovery		8
	Selenium Spike Recovery		용
	Silver Spike Recovery	105	8

On November 24, 1992 the U.S. EPA lifted the TCLP requirement for matrix spike bias adjustment for measured values. The rule, however, still requires laboratories to perform matrix spike recovery analysis to validate results.



	CLIENT Keystone		
	DATE COLLECTED	06-21-95	
	DATE RECEIVED	06-21-95	
	DATE OF REPORT	07-05-95	
	SAMPLE DESCRIPTION	#18	
	P.O. NUMBER	P95-026	
	LAB NUMBER	95060645	
LAB NUMBER	ANALYSIS	RESUL	TS
95060645	Arsenic	0.03	ma/l
	Barium	0.76	mg/1
	Cadmium	0.01	mq/l
	Chromium	0.01	mq/l
	Lead	0.06	mq/1
	Mercury	<0.0003	ma/1
	Selenium	0.03	$m\alpha/1$
	Silver	<0.001	mq/1
		<u><0.001</u>	ma/l
	Arsenic Spike Recovery		
	Arsenic Spike Recovery Barium Spike Recovery	111	8
	Arsenic Spike Recovery Barium Spike Recovery Cadmium Spike Recovery	111 97 100	8
	Arsenic Spike Recovery Barium Spike Recovery	111 97 100	\$ \$ \$
	Arsenic Spike Recovery Barium Spike Recovery Cadmium Spike Recovery Chromium Spike Recovery Lead Spike Recovery	111 97 100 100	\$ \$ \$ \$
	Arsenic Spike Recovery Barium Spike Recovery Cadmium Spike Recovery Chromium Spike Recovery	111 97 100 100 110	\$ \$ \$ \$

On November 24, 1992 the U.S. EPA lifted the TCLP requirement for matrix spike bias adjustment for measured values. The rule, however, still requires laboratories to perform matrix spike recovery analysis to validate results.



CLIENT	Kevstone		
DATE COLLECTED	06-21-95		
DATE RECEIVED	06-21-95		
DATE OF REPORT	07-05-95		
SAMPLE DESCRIPTION	#19		
P.O. NUMBER	P95-026		
LAB NUMBER	95060646		
ANALYSIS	RESUI	LTS	
	40.00	m# /1	
rsenic	<u> <0.02</u>	<u>mg/l</u>	
arium	0.71	mg/1	
admium	0.003	ma/l	

LAB NUMBER	ANALYSIS	RESULI	rs
95060646	Arsenic	<0.02	mg/1
	Barium	0.71	ma/1
	Cadmium	0.003	mq/1
	Chromium	<0.002	mq/1
	Lead	<0.01	mq/1
	Mercury	<0.0003	mg/1
	Selenium	<0.01	mq/1
	Silver	0.006	mq/1
	Arsenic Spike Recovery	111	8
	Barium Spike Recovery	97	8
	Cadmium Spike Recovery	100	8
	Chromium Spike Recovery	100	a l
	Lead Spike Recovery	110	8
	Mercury Spike Recovery	97	8
	Selenium Spike Recovery	127	8
	Silver Spike Recovery	105	8

On November 24, 1992 the U.S. EPA lifted the TCLP requirement for matrix spike bias adjustment for measured values. The rule, however, still requires laboratories to perform matrix spike recovery analysis to validate results.



			3
	CLIENT	Keystone	
	DATE COLLECTED	06-21-95	
	DATE RECEIVED	06-21-95	
	DATE OF REPORT	07-05-95	
	SAMPLE DESCRIPTION	#20	- Nagdjardin pr
	P.O. NUMBER	P95-026	- Colonia
	LAB NUMBER	95060647	e epiper
LAB NUMBER	ANALYSIS	RESULTS	
95060647	Arsenic	<0.02 =	
	Barium	0,57	
	Cadmium	0.01	
	Chromium	<0.002	
	Lead	0.03	
	Mercury	<0.0003 =	
	Selenium	0.03	
	Silver	<0.001	
	Arsenic Spike Recovery	111	
	Barium Spike Recovery	97	
	Cadmium Spike Recovery	100	***
	Chromium Spike Recovery	100	
	Lead Spike Recovery	110	
	Mercury Spike Recovery	97	
	Selenium Spike Recovery	127	
	Silver Spike Recovery	105	
	TATA LOT DATUE WECOACT	_ _ * * * * * 	

On November 24, 1992 the U.S. EPA lifted the TCLP requirement for maximum bias adjustment for measured values. The rule, however, stimmer laboratories to perform matrix spike recovery analysis to validate.

July Destate Section



	CLIENT	Keystone		
	DATE COLLECTED	06-21-95		
	DATE RECEIVED	06-21-95		
	DATE OF REPORT	07-05-95		
	SAMPLE DESCRIPTION	#21		
	P.O. NUMBER	P95-026		
	LAB NUMBER	95060648		
LAB NUMBER	ANALYSIS	RESUL	TS	
95060648	Arsenic	0.02	ma/l	
230000	Barium	0.78	mg/l	
	Cadmium	0.01	mq/1	
	Chromium	0.009	mg/1	
	Lead	<0.01	mg/1	
	Mercury	<0.0003	mg/1	
	Selenium	0.02	mg/1	
	Silver	<0.001	mg/l	
	Arsenic Spike Recovery	111	8	
	Barium Spike Recovery	97	8	
	Cadmium Spike Recovery	100	. 8	
	Chromium Spike Recovery	100	8	
	Lead Spike Recovery	110	8	
	Mercury Spike Recovery	97	8	
	Selenium Spike Recovery	127	8	
	Detenium DDIVe Veccovers		v	

On November 24, 1992 the U.S. EPA lifted the TCLP requirement for matrix spike bias adjustment for measured values. The rule, however, still requires laboratories to perform matrix spike recovery analysis to validate results.



\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \				
	CLIENT	Ke	vstone	
	DATE COLLECTED	06	-21-95	
	DATE RECEIVED	06	-21-95	
	DATE OF REPORT	07	-05-95	
	SAMPLE DESCRIPTION		#22	
	P.O. NUMBER	P	95-026	
	LAB NUMBER	95	060649	
LAB NUMBER	ANALYSIS		RESUL	rs
95060649	Arsenic		<0.02	mg/1
23000043	Barium	—	0.52	mg/1
	Cadmium		0.021	mq/l
	Chromium		0.003	mq/1
	Lead		0.37	mg/l
	Mercury		<0.0003	mg/1
	Selenium		0.01	$m\sigma/1$
	Silver		<0.001	mq/1
	Arsenic Spike Recovery		111	8
	Barium Spike Recovery		97	- 8
	Cadmium Spike Recovery	6	100	8
	Chromium Spike Recovery		100	8
	Lead Spike Recovery		110	8
	Mercury Spike Recovery		97	8
	Selenium Spike Recovery		127	8
	Silver Spike Recovery		105	- 8

On November 24, 1992 the U.S. EPA lifted the TCLP requirement for matrix spike bias adjustment for measured values. The rule, however, still requires laboratories to perform matrix spike recovery analysis to validate results.

TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the north

PHOTOGRAPH NUMBER: 1

ROLL NUMBER: 96-213-0



DATE: July 30, 1996

TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

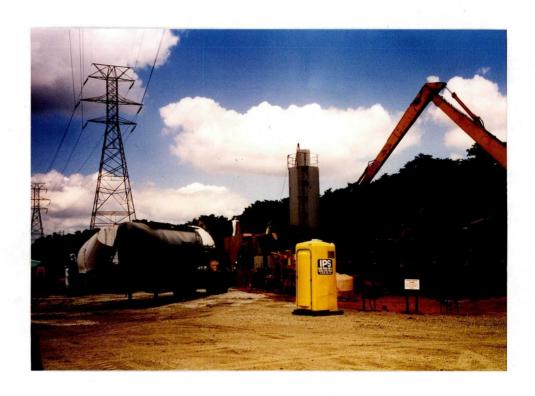
John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken toward the northeast

PHOTOGRAPH NUMBER: 2



TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the northeast

PHOTOGRAPH NUMBER: 3

ROLL NUMBER: 96-213-2



DATE: July 30, 1996

TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken toward the south

PHOTOGRAPH NUMBER: 4



TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the south

PHOTOGRAPH NUMBER: 5

ROLL NUMBER: 96-213-4



DATE: July 30, 1996

TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken toward the north

PHOTOGRAPH NUMBER: 6



TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the east

PHOTOGRAPH NUMBER: 7

ROLL NUMBER: 96-213-6



DATE: July 30, 1996

TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken toward the south

PHOTOGRAPH NUMBER: 8



TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the southeast

PHOTOGRAPH NUMBER: 9

ROLL NUMBER: 96-213-8



DATE: July 30, 1996

TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken toward the south

PHOTOGRAPH NUMBER: 10

LL NUMBER: 96-213-9

PHOTOGRAPH DID NOT DEVELOP. PHOTOGRAPH WAS OF THE INSIDE OF THE NORTH TANK USED TO STORE RADIOACTIVE ARC DUST SHOWN IN PHOTOGRAPH 9.

TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the south

PHOTOGRAPH NUMBER: 11

ROLL NUMBER: 96-213-10

PHOTOGRAPH DID NOT DEVELOP. PHOTOGRAPH WAS OF THE OUTSIDE OF THE SOUTH TANK USED TO STORE RADIOACTIVE ARC DUST.

DATE: July 30, 1996

TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the south

PHOTOGRAPH NUMBER: 12

LL NUMBER: 96-213-11

PHOTOGRAPH DID NOT DEVELOP. PHOTOGRAPH WAS OF THE INSIDE OF THE SOUTH TANK USED TO STORE RADIOACTIVE ARC DUST.

TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the northwest

PHOTOGRAPH NUMBER: 13

ROLL NUMBER: 96-214-0



DATE: July 30, 1996

TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

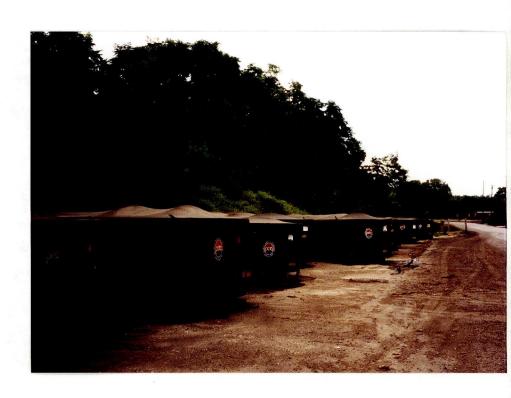
LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the north

PHOTOGRAPH NUMBER: 14



TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

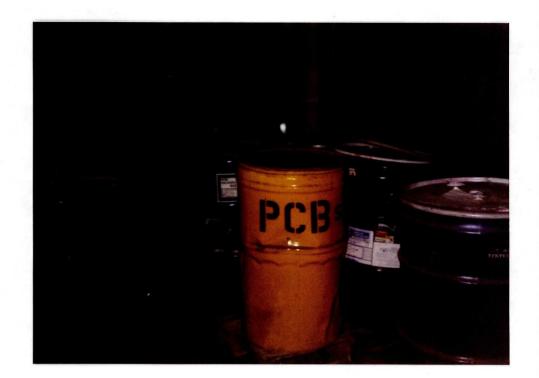
1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the southeast

PHOTOGRAPH NUMBER: 15

ROLL NUMBER: 96-214-2



DATE: July 30, 1996

TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

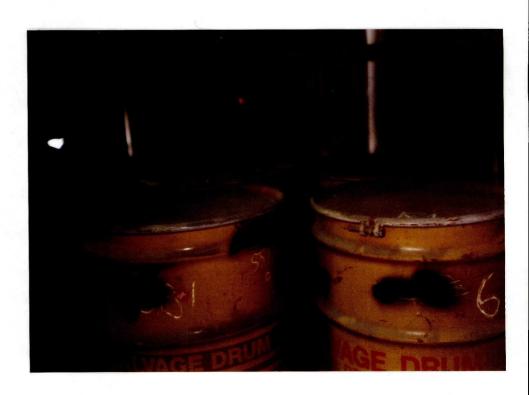
John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken toward the east

PHOTOGRAPH NUMBER: 16



TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the east

PHOTOGRAPH NUMBER: 17

ROLL NUMBER: 96-214-4



DATE: July 30, 1996

TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken toward the south

PHOTOGRAPH NUMBER: 18



TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the east

PHOTOGRAPH NUMBER: 19

ROLL NUMBER: 96-214-6



DATE: July 30, 1996

TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the east

PHOTOGRAPH NUMBER: 20



TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the northeast

PHOTOGRAPH NUMBER: 21

ROLL NUMBER: 96-214-8



DATE: July 30, 1996

TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken toward the southwest

PHOTOGRAPH NUMBER: 22



TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the east

PHOTOGRAPH NUMBER: 23

ROLL NUMBER: 96-214-10



DATE: July 30, 1996

TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken toward the northeast

PHOTOGRAPH NUMBER: 24



TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

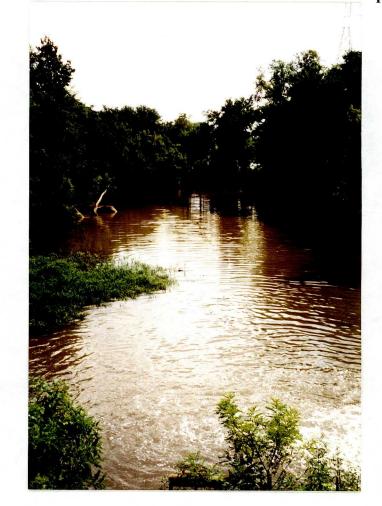
1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the south

PHOTOGRAPH NUMBER: 25

ROLL NUMBER: 96-215-0



DATE: July 30, 1996

TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken toward the north

PHOTOGRAPH NUMBER: 26



TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

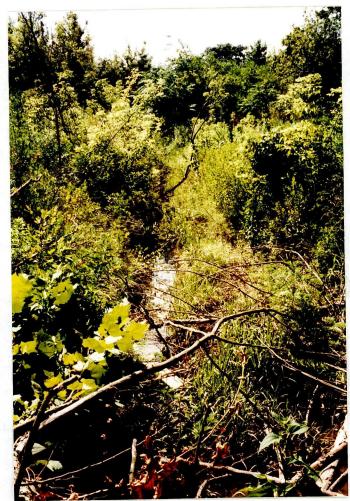
1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the northwest

PHOTOGRAPH NUMBER: 27

ROLL NUMBER: 96-215-2



DATE: July 30, 1996

TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the southwest

PHOTOGRAPH NUMBER: 28



TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the west

PHOTOGRAPH NUMBER: 29

ROLL NUMBER: 96-215-4



DATE: July 30, 1996

TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken toward the south

PHOTOGRAPH NUMBER: 30



TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

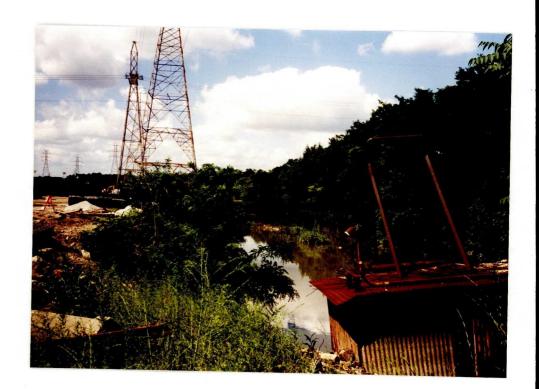
1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the north

PHOTOGRAPH NUMBER: 31

ROLL NUMBER: 96-215-6



DATE: July 30, 1996

TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the east

PHOTOGRAPH NUMBER: 32



TIME:

9:15 a.m. to 4:50 p.m.

PHOTOGRAPHED BY:

John Tripses

LOCATION:

1430050001 -- Peoria County Keystone Steel & Wire Company ILD000714881

COMMENTS: Photograph taken

toward the southeast

PHOTOGRAPH NUMBER: 33



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY BUREAU OF LAND/FIELD OPERATIONS SECTION

RCRA INSPECTION REPORT

		GENEI	RAL FACIL	ITY INFO	RMATION		
USEPA ID #:	ILD0007	14881			IEPA ID #: 14	13005000	21
Facility Name:	Keystone	Steel + Wir	z Co.			Phone #: 3	09/697-7020
	1000 S. (County: Peoria				
	eoria			State: 11		Zip Code: (Control of the Contro
Region: 3			Inspection Date	:07/30/19	96	Time: 9:	
Weather:						4:	50 pm
1 May 200 1 May 200 1 May 200 1 May 200 1 May 200 1 May 200 1 May 200 1 May 200 1 May 200 1 May 200 1 May 200 1			TYPE OF	FACILITY			
Notified As:	;				Regulated As:	G/ST	
			TYPE OF D	NSPECTIO	N		
CEI: X CMI	E/O&M: C	SI: NER:	F/U to:	. CC:	PIF: CVI:	CSE: C	Other:
	N	OTIFICAT	ION INFOR	RMATION	(EPA 8700-1	(2)	
Notification Dat	e: 08 /18 /8	D (initial)				1 1	(subsequent
	P	ART A PEI	RMIT INFO	RMATION	(EPA 3510-	-3)	
Part A Date:	118180		Amended:	1 1		Withdraw	n: 0/ 28 /92
		PART	B PERMIT	INFORM	ATION		
Part B Submitte	d/Issued (circle o	ne): / /					
		A	CTIVE EN	ORCEME	NT		
Has the company	y been referred to	o: USEPA: O	108185 IA	.GO: / /	County St	ate's Attorney:	1 1
		the same of the last of the la	E ENFORC	NAME AND ADDRESS OF THE OWNER, WHEN PERSON NAMED IN	RDERS		
CACO: /	1		CAFO: /	1	Fe	deral Court Orde	er: / /
Consent Decree:	07 129 193		IPCB Order:	1 1	Sta	ne Court Order:	1 1
		TSD FACI	LITY AC	TIVITY S	UMMARY	7	
Activity by Process Code	On Part A?	On Part B?	Activity ever done?	Closed?	Being done during insp?	Exempt per 35 IAC Sec:	On Annual Report
Sol					46		1915 1944 1993
	No	No Part B	Yes	No .	Na		No Yes! No
\$02 803	ملا		Yes	No	No		No 1 yes 1 No
503	yes		Yes	1978	Yes		No INO INO
004	NA		Yes	No	Yes		UD WO IN.
					REC	EIVED	1 1
					oct	1 0 1996	1 1
					· IEPA	-DLPC	1 1
							1 /
							, ,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY BUREAU OF LAND/FIELD OPERATIONS SECTION RCRA INSPECTION REPORT

		GENER	AL FACIL	ITY INFO	EMATION		
USEPA ID #: I	LD0007	14881			IEPA ID #: 14	3005000	1
Facility Name:	Keystone S	Steel + Win	Co.			Phone #: 36	9/697-2020
	000 S. A					County: P	
	eoria			State: 14		Zip Code: 4	
Region: 3			Inspection Date:	07/30/19	96	Time: 9:1	Sam -
Weather:							50 pm
			TYPE OF	FACILITY			
Notified As: G	,				Regulated As:	G/ST	
		7	TYPE OF I				
CEI: CME	:/O&M: CS	I: NER:	F/U to: 04 123	CC:	PIF: CVI:	CSE: O	ther:
	N	OTIFICAT	ION INFOR	MATION	(EPA 8700-1	2)	
Notification Date	e: 08 /18 /8	0 (initial)				1 1	(subsequen
			MIT INFO	RMATION	(EPA 3510-	3)	
Part A Date:	/ 18 / 80		Amended:	1 1		Withdraw	n: 0/ 28 /92
		PART	B PERMIT	INFORM	ATION		
art B Submitted	d/Issued (circle o	ne): 1 /					
		A	CTIVE EN	ORCEME	NT		
Has the company	y been referred to	: USEPA: OI	108195 LA	GC: /	County St	ate's Attorney:	, ,
			E ENFORC		RDERS		
CACO: /	1		CAFO: /	1	Fe	deral Court Orde	er: / /
Consent Decree:	07 129 193		IPCB Order:	1 1	Sta	te Court Order:	1 /
		TSD FACI	LITY AC	TIVITY 9	UMMARY	7	
Activity by Process Code	On Part A?	On Part B?	Activity ever done?	Closed?	Being done during insp?	Exempt per 35 IAC Sec:	On Annual Report 1915 1994 199
Sol	No	No Part B	Ves	No	No		No / Yes/ No
Soz	No		Yes	NB	Na		
503	Yes		Yes	1978	Yes		No INO INO
50\$	No		Yes	No	Ves		NO 400 INA
			7		,		1 1
					RECI	IVED	1 1
					OCT 1	0 1996	1 1
						DLPC	1 1
					1		1 1
					 		

OWNER					OPERATOR			
Name: Keystone Consolidated Industries					Name: Same as facility			
Address: 4835 LBJ Freeway, Suite 30				OO Address:				-
iy: Dallas				City:				
State:	<u>X</u>		Zip Code: 7	5234	State:		Zip Code:	
Phone #:					Phone	#:		We the second
	N(S) INTERVIEWE	ED		TITLE			PHONE #	
Dales	Bennington			mar. of Energy +	Env.	Engr	309/697-7020	
Bob n	niller			Mar of Engineerin	+ Ma	interence		
Dave !	Semelroth			Design Engineer ERM North Con			11	
Elton	Breland			ERM North Con	Eval			
ndol	Greifen			ERM North Cen	val			-
NSPEC	CTION PARTICIPA	NT(S))	AGENCY/DIVISIO	N		PHONE #	A STEP STORY
John	Tripses			TEPA/DLPC			309/193-5463	2
Tim N	lebergall			IEPA/DWIC (GEC :	Entern)	309/693-5463	7
Kristin	lebergall ne Deurison		9	IEPA/DAPE (G				
nicha	el Cunningham			USEPA/OFFice a	312/886-446			
	J							
				i			1	
EPA	RED RV			AGENCY/DIVISIO	N		PHONE #	-
	RED BY			AGENCY/DIVISIO	N	//	PHONE #	7
	Tripses	TRAT A	DV OF	IEPA/DLPC		LATIO	309/693-546	Z
John	Tripses SUM	T		IEPA/DLPC APPARENT	VIO		309/693-546 NS	
John	Tripses SUM SECTION	x	AREA	IEPA/DLPC APPARENT SECTION	VIO:	LATIO AREA	309/693-546	
John AREA	SUM SECTION 703.121(4)	T	AREA	SECTION 225.173(L)	VIO x x		309/693-546 NS	
AREA DOR	Tripses SUM SECTION 703.121(4) 703.121(4)	X X X	Dm.R.	SECTION 725.173(L) 725.174(A)	VIO:		309/693-546 NS	
AREA DOR DOR	Tripses SUM SECTION 703.121(4) 703.121(4) 703.121(4)	X	DMR DMR GLB	IEPA/DLPC APPARENT SECTION 725.173(L) 725.174(A) 728.107(C)	VIO x x		309/693-546 NS	
AREA DOR DOR DOR	Tripses SUM SECTION 703.121(4) 703.121(4) 703.150(A) 722.111	X X X	DMR DMR GLB GLB	IEPA/DLPC APPARENT SECTION 725.173(L) 725.174(A) 728.107(A)	VIO x x		309/693-546 NS	
AREA DOR DOR DOR GGR	Tripses SUM SECTION 703.121(4) 703.121(1) 703.150(A) 722.111 722.112(c)	X X X	DMR DMR GLB GLB	IEPA/DLPC APPARENT SECTION 725.173(L) 725.174(A) 728.107(A) 728.107(A)	VIO x x		309/693-546 NS	
AREA DOR DOR DOR GGR GGR	Tripses SUM SECTION 703.121(4) 703.121(1) 703.150(a) 722.111 722.112(c) 722.120(a)	X X X	DMR DMR GLB GLB	IEPA/DLPC APPARENT SECTION 725.173(L) 725.174(A) 728.107(A) 728.107(A) 728.107(A) 21(4)	VIO x x		309/693-546 NS	
AREA DOR DOR DOR GGR GGR	Tripses SUM SECTION 703.121(4) 703.150(a) 722.111 722.112(c) 722.120(a) 722.120(b)	X X X	DMR DMR GLB GLB	IEPA/DLPC APPARENT SECTION 725.173(L) 725.174(A) 728.107(A) 728.107(A)(2) 21(4) 21(4)	VIO x x		309/693-546 NS	
AREA DOR DOR DOR GGR GGR GMR	Tripses SUM SECTION 703.121(4) 703.150(A) 722.111 722.112(c) 722.120(4) 722.120(4) 722.121(4)	X X X	DMR DMR GLB GLB	IEPA/DLPC APPARENT SECTION 725.173(L) 725.174(A) 728.107(A) 728.107(A) 728.107(A) 21(4)	VIO x x		309/693-546 NS	
AREA DOR DOR DOR GGR GGR GMR	Tripses SUM SECTION 703.121(4) 703.121(4) 703.150(a) 722.111 722.112(c) 722.120(q) 722.120(4) 722.121(q) 722.122	X X X	DMR DMR GLB GLB	IEPA/DLPC APPARENT SECTION 725.173(L) 725.174(A) 728.107(A) 728.107(A)(2) 21(4) 21(4)	VIO x x		309/693-546 NS	
John AREA DOR DOR GGR GGR MR MR	Tripses SUM SECTION 703.121(4) 703.150(A) 722.111 722.112(c) 722.120(a) 722.120(b) 722.121(q) 722.122 722.123(a)	X X X	DMR DMR GLB GLB	IEPA/DLPC APPARENT SECTION 725.173(L) 725.174(A) 728.107(A) 728.107(A)(2) 21(4) 21(4)	VIO x x		309/693-546 NS	
AREA DOR DOR DOR GGR GGR GMR GMR	Tripses SUM SECTION 703.121(4) 703.121(4) 703.150(a) 722.111 722.112(c) 722.120(a) 722.120(b) 722.121(a) 722.122 722.123(b)	X X X	DMR DMR GLB GLB	IEPA/DLPC APPARENT SECTION 725.173(L) 725.174(A) 728.107(A) 728.107(A)(2) 21(4) 21(4)	VIO x x		309/693-546 NS	
AREA DOR DOR DOR GGR GGR GMR GMR GMR	Tripses SUM SECTION 703.121(4) 703.150(a) 722.111 722.112(c) 722.120(a) 722.120(b) 722.121(q) 722.122 722.123(a) 722.123(b) 722.134(a)(2)	X X X	DMR DMR GLB GLB	IEPA/DLPC APPARENT SECTION 725.173(L) 725.174(A) 728.107(A) 728.107(A)(2) 21(4) 21(4)	VIO x x		309/693-546 NS	
AREA DOR DOR DOR GOR GOR GMR GMR GMR FT	Tripses SUM SECTION 703.121(4) 703.121(4) 703.150(a) 722.111 722.112(c) 722.120(a) 722.120(b) 722.122 722.123(a) 722.123(b) 722.134(a)(2) 722.134(a)(4)	X X X	DMR DMR GLB GLB	IEPA/DLPC APPARENT SECTION 725.173(L) 725.174(A) 728.107(A) 728.107(A)(2) 21(4) 21(4)	VIO x x		309/693-546 NS	2
AREA DOR DOR DOR DOR GGR GGR GMR GMR GMR GMR	Tripses SUM SECTION 703.121(4) 703.150(a) 722.111 722.112(c) 722.120(a) 722.120(b) 722.121(q) 722.122 722.123(a) 722.123(b) 722.134(a)(2)	X X X	DMR DMR GLB GLB	IEPA/DLPC APPARENT SECTION 725.173(L) 725.174(A) 728.107(A) 728.107(A)(2) 21(4) 21(4)	VIO x x		309/693-546 NS	

FacilityNam	Keystone Steel + Wim C.	USEPA ID #: ILD000714881	
Inspection	: '07/30/94	IEPA ID #: 1430050001	

WASTE DISPOSITION FORM

Waste Name	Generating Process	Last	USEPA HW#	Notification?		for	Year	rs:	On-Site	Rate of	Last Manifested	Disposition of
		Analysis		(8700-12)	(3510-3)	1993	1994	1995		Generation	Shipment	Waste
Vasta Astroloom Vapthc	Cleaning	D015	000 (000 (0040		У	y	У	5**	Narrat	ice -	
kloroethylene	Cleaning	٢	F002			N	N	y	See	Narra	tius -	
vader + 1,1,1 richloro ethylogy	Cleaning		FOOZ			N	N	. 🗸	See	Narrad		
naderial	Painting		1000 F00 3 F00 5			Y	У	Ý	See	Narva		
Pastr Latex	Painding		0003			V	V	V	Say	Narva		
Jack Flammable	Unknown		0001			N	N		Ser	Narve	1	->
Jask Mineral Spinis + Oi	Cleaning		0001			N	У	N	See	Narve		-
ry mixtur	Sp: 11 Cleanup		0001			N	\/ \/	N	See	1		->
hydroxide	Cloaning		0002			N	Y	N	Sap	Narr		->
Wad Perch. 4 111 Trichlosethan	Cleaning		F00 Z			N	V	N	Sex	1		->
1,1,1 Trichlowelliane	Cleaning		F002			Y	N	N	See	Narra		>
Kerosen +	Cleaning		0001			Y	N	N	See	1	die -	>
oil/Reholeum	claning		0001			y	N	V	See	1		>
Trichlorushau	Spill Cleanup		F002			V	N	N	S.			\(\)
Arc Dust Radio acute	Manufacturing		KOLI			See		Jarra				->
Arc Dush Non Radioacles	Manufacturing		KOU			Y	Y	4	See	Navy	a din -	->
Spand Pickle Liquar	manufacturing		K067	2		See	·N	brad				
	0											
,												
		1				1			1			

the following hazardous wastes are generated.

NARRATIVE

Keystone Steel & Wire Company (Keystone) was inspected on July 30, 1996 from 9:15 a.m. to 4:50 p.m. The inspection was an LDF/CEI. The inspection consisted of an interview with facility personnel, a review of facility documents, and a site tour. The following persons participated in the inspection:

Bob Miller . . Manager of Engineering & Maintenance

Dale Bennington . . Manager of Energy & Environmental

Engineering

Dave Semelroth . . Design Engineer

Elton Breland . . ERM North Central, Inc.

John Greifzu.. ERM North Central, Inc.

North Central, Inc.

RECEIVED

Michael Cunningham . . USEPA

Tim Nebergall . . IEPA Kristine Dzurison . . IEPA OCT 1 0 1996 LEPA-DLPC

John Tripses . . IEPA (author)

Keystone manufactures steel bars, rods, fence, posts, and nails. During the manufacturing processes,

Waste Petroleum Naphtha - D001, D006, D008, D018, D035, D039, D040

This waste is generated when dies are cleaned. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327	1,045 gal	880 gal	770 gal
Safety-Kleen ILD093862811	728 gal	877 gal	1,484 gal

The 1995 annual report did not list all the hazardous waste codes for this waste. The manifests listed D001, D006, D008, D018, D035, D039, D040 but the annual report listed only D001. In 1996, Keystone started shipping this waste to Pollution Control Industries (IND000646943).

Tetrachloroethylene - F002

This waste is generated during cleaning. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Keystone Steel & Wire Company ILD000714881
July 30, 1996

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John Tripses

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327			165 gal

Water & 1.1.1 Trichloroethylene - F002

This waste is generated during cleaning. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Pollution Control Industries IND000646943			495 gal

Waste Paint Related Material - D001, F003, F005

This waste is generated from painting in the wire mill. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327	220 gal	165 gal	165 gal

Waste Latex Paint - D001, D036

This waste is generated in the galvanizing line. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Chief Supply Co. OKD089761290		990 gal	
Clayton Chemical Co. ILD066918327	990 gal	s	
Pollution Control Industries IND000646943			154 gal

Waste Flammable Liquid - D001

This waste is a mixture of gasoline and diesel fuel mixture. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327			275 gal

Waste Mineral Spirits & Oil - D001

This waste is generated during parts cleaning. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327		275 gal	

Gasoline/Oil Dry Mix - D001

This waste is generated when gasoline spills in the autoshop are cleaned up. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327		55 gal	

Waste Sodium Hydroxide (D002)

This waste was a soap that was used on a trial basis to clean nails. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327		55 gal	

Waste Perchloroethylene/1.1.1 Trichloroethane - F002, D001

This waste is generated during cleaning. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327		165 gal	

1.1.1 Trichloroethane - F002

The waste was generated during degreasing. The waste is no longer generated. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327	21,340 gal		
Waste Research & Reclamation WID990829475	1,211 gal		

Kerosene & Oil - D001

This waste was generated during parts cleaning and was discontinued. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327	330 gal		

Oil/Petroleum Naphtha - D001

This waste is generated in cleaning. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327	605 gal		165 gal

Oil Dry/1.1.1 Trichloroethane - F002

This waste is generated during spill cleanups. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Clayton Chemical Co. ILD066918327	55 gal		

Arc Dust (Non-Radioactive) - K061

This waste is generated when metal is melted in the arc shop. The roof of the arc shop has a ridge vent that is connected to a bag house. An induced draft air system draws the arc dust into the vent system and into the bag house. Photograph 8 shows the roll-off boxes used to accumulate the arc dust. Photograph 14 shows the area where roll-off boxes are placed after they are moved from the arc shop and placed prior to shipment off-site. According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Peoria Disposal Co. ILD000805812	17,686,237 gal	18,644,640 gal	20,606,022 gal

The annual reports listed 420,000 gallons as generated in 1993 and stored and listed 1,308,000 gallons as generated prior to 1993 and stored. The stored waste was initially regulated by the Illinois Department of Nuclear Safety (IDNS) as radioactive and could not be shipped off-site. In 1993, IDNS determined that any of the waste that was less than 2 pCi/g was not regulated as radioactive and could be shipped off-site. The next section contains additional information about the radioactive arc dust.

Arc Dust (Radioactive) - K061

This waste was generated in 1992 and 1993 when a radioactive source was melted with scrap metal in the arc shop. On December 5, 1992, a shipment of arc dust was rejected by Horsehead Research

and Development (ILD040891368) because it was radioactive. Keystone was unable to ship any of the arc dust off-site because of the radioactivity. The dust was contaminated with cesium-137. Keystone notified IDNS and the IEPA of the problem. Keystone continued to operate and continued to produce radioactive arc dust. The arc dust was placed in roll-off boxes. Keystone shut down for two weeks at the end of December 1992 and attempted to clean the system of the radioactive dust. When they resumed operation, the dust was still radioactive. In addition to placing the waste in 51 roll-off boxes, the dust was placed in two tanks. Keystone obtained the necessary permit (License No. IL-01510-01) from IDNS for storing the radioactive arc dust.

On August 5, 1993, IDNS wrote Keystone and allowed all arc dust produced after the cleanup activities and containing cesium-137 concentrations equal to or less than 2 pCi/g to be shipped off-site as a nonradioactive. Keystone has removed the waste from the two tanks. Photographs 9, 10, 11, and 12 show the two tanks. (Photographs 10, 11, and 12 did not develop and the negative appeared to be light fogged.) Photographs 13 shows one of the areas where containers were stored. All radioactive arc dust has been shipped off-site.

Keystone did not have a RCRA permit to store the radioactive arc dust in tanks or containers (roll-off boxes). On June 30, 1995, Keystone submitted a RCRA closure plan for the tanks and container storage areas where the containers were removed. The closure plan was approved on September 28, 1995 (Log No. C-754). A closure certification was submitted to the Agency on January 3, 1996. The closure certification is being reviewed by Permits Section.

According to the annual reports for the last three years, the following amounts were generated and shipped off-site.

Off-Site Facility	1993	1994	1995
Envirocare of Utah UTD982598898		1,751,281 lbs	770,440 lbs

In 1992 and 1993, Keystone generated 2,400,000.9 lbs of radioactive arc dust. The 1994 annual report listed 648719.4 lbs in storage.

Emission Control Bags (Radioactive) - K061

This waste is the bags from the baghouse that were radioactive. 71,360 lbs were generated and stored in 1993 but were not listed on the annual report. In 1994, the entire waste was shipped to Envirocare of Utah (UTD982598898).

Spent Pickle Liquor - K062

This waste is generated in the Mid Mill and in the Wire Mill. When the acid used for pickling is dirty, it is pumped from the pickling tanks to a 40,000-gallon spent acid tank. From the spent acid tank the acid is pumped to a 10,000-gallon treating tank. In the treating tank, the acid is chilled to 32 °F. From the treating tank, the acid is pumped through a centrifuge. Ferrous sulfate heptahydrate crystals are separated from the acid. The acid goes to the 30,000-gallon recovered acid tank and from there back to the pickling tanks. The crystals are sold to another company. Photograph 23 shows the pile of ferrous heptahydrate crystals.

When the acid is so dirty it can no longer be cleaned and when the pickling tanks are cleaned out, the spent pickle liquor flows to a holding tank in the Mid Mill building. There the pH is controlled by adding lime. From there, it flows through a pipe to the wastewater treatment plant where it is further treated. The wastewater from the treatment plant is discharged to the Illinois River under an NPDES permit. The wastewater treatment plant is totally enclosed and permitted by the Division of Water Pollution Control and, therefore, is exempt from regulation under RCRA by Section 703.123(d). The sludge from the treatment plant is stored in two surface impoundments. The sludge (formerly K063) has been delisted.

The spent pickle liquor used to be mixed with nonhazardous wastewaters and pumped into the South Ditch (see photographs 27 and 30) and the Mid Mill Ditch (see photograph 31). The Mid Mill Ditch flows into the South Ditch. From the lower half of the South Ditch (see photograph 26), the mixture was pumped to the 24-Hour Retention Basin. These ditches and the North Ditch (see photographs 1, 5, and 6) are regulated as surface impoundments. In addition, the South Ditch was dredged. The sludge was placed in two waste piles west of the South Ditch (see photographs 28 and 29). Keystone Steel & Wire Company does not have a RCRA permit for storage of spent pickle liquor in surface impoundments or in waste piles. An enforcement action was filed against Keystone Steel & Wire Company for this activity. As a result of this, Keystone Steel & Wire Company quit pumping spent pickle liquor into the ditches on October 31, 1986. Nonhazardous wastewaters are still pumped into the South Ditch and the Mid Mill Ditch.

The surface impoundments and waste piles are undergoing a RCRA closure that is estimated to take 11 years and is part of a consent decree (No. 93-CH-000103). The closure of the 24-Hour Retention Basin has been certified. Keystone is working on the closure of the North Ditch. Photographs 1, 2, 3, 4, 5, 6 and 7 show the closure activities at the North Ditch. The excavators shown in photographs 1 and 5 place the sediment from the ditch into a screen shown in photograph 2. Debris is screened out and placed into a roll-off box. Photograph 7 shows a roll-off box containing the debris. The sediment is conveyed from the screen into a mixer where it is mixed with lime. Photograph 3 shows the mixture being loaded into roll-off boxes. Photograph 4 shows the area where the roll-off boxes are sampled. Photographs 32 and 33 show the area where roll-off boxes are accumulated prior to shipment off-site. If the mixture meets the delisting criteria, it is shipped off-

site as nonhazardous waste. If not, it is returned to the ditch for additional treatment. Keystone has shipped 17,500 tons of treated residues from the North Ditch to Peoria City County Landfill (1438160002). ERM North Central is overseeing the closure activities for Keystone. Keystone and ERM North Central hope to have the North Ditch closure activities completed this year.

The debris from the ditch is shipped off-site as K062 to Peoria Disposal Company (1438120003 and ILD000805812). Initially, the manifests listed the waste as "K062: Spent pickle liquor generated by the steel finishing operations of facilities within the iron and steel industries (SIC codes 331 & 332)." Peoria Disposal Company wanted the waste listed as "K062: contaminated w/PPE, HDPE, & slag" because it fit the permit (000390). Shipments of this waste started on July 16, 1996 and there have been approximately 45. Seven shipments were returned to Keystone for freestanding water. The water was drained into an untreated ditch and the waste was remanifested off-site.

In April 1996, sediment from the Mid Mill Ditch was treated but did not pass the delisting test. The waste was shipped off-site as hazardous waste because Keystone did not want to do additional testing on each roll-off box. 115 containers and 1,855 tons were shipped off-site to Peoria Disposal Company (1438120003 and ILD000805812).

On June 5, 1995, Keystone had a spill of pickle liquor from the acid recovery building. A copy of the Illinois Emergency Management Agency incident report is attached. The incident number is 951191. Keystone was told by the author during an inspection that was conducted on June 6, 1995 that any waste that was cleaned up from the spill would have to be disposed of as a hazardous waste (K062). All contaminated soil from the clean-up would be a hazardous waste because of the following reasons:

- 1. The spilled pickle liquor is K062 spent pickle liquor generated by steel finishing operations from facilities within the iron and steel industry. (Section 721.132).
- 2. The pickle liquor is "spent material" because it has been used and as a result of contamination can no longer serve the purpose for which it was produced. (Section 721.101(c)(1)).
- 3. The soil and spent pickle liquor mixture is a hazardous waste because it is a mixture of a solid waste and a hazardous waste that is listed in Subpart D. (Section 721.103(a)(2)(D)).

Keystone hired Peoria Disposal Company to clean up the spill. The soil was neutralized and shipped as nonhazardous waste to Peoria City-County Landfill. A copy of Keystone's report to Emergency Response Unit (including copies of the manifests) is attached. Keystone sent the waste from the clean-up off-site as a nonhazardous waste to a nonhazardous waste landfill. The material should have been sent off-site as K062 to a hazardous waste landfill. Photograph 24 shows the area where

the spill occurred.

Photographs 15, 16, 17, and 18 show the 90-day accumulation area in the Mid Mill Building. There were four barrels of waste paint and thinner, six barrels of waste paint, two barrels of mineral spirits, one barrel of water & oil (nonhazardous), five barrels of PCB waste (two with open top and one with a hole in the side), and five barrels (four in overpacks) of unknown waste. Neither Mr. Bennington nor Mr. Semelroth knew what was in the five barrels of unknown waste.

On June 28, 1996, Keystone spilled some acid (IEMA Incident No. 960930). The soil was cleaned up and placed in a roll-off box. Mr. Bennington said that Keystone was going to handle the soil as a hazardous waste (D002). The roll-off box was labeled "Hazardous Waste" but did not have an accumulation date.

The training plan was last revised on February 17, 1995. The last personnel training took place in March and April 1995. The last new employee personnel training took place on May 1, 1995. Keystone is working on revising the training program to combing RCRA and OSHA training. The training will be given this fall.

During the review of documents and site tour, the following apparent violations were observed:

- Section 703.121(a) of the Regulations Keystone stored spent pickle liquor (K062) in surface impoundments and radioactive arc dust (K061) in containers and tanks without a RCRA permit. Keystone failed to comply with the requirements of Section 722.134(a) and no longer qualifies for the exemption from RCRA permitting for generators who accumulate waste on-site for 90 days of less.
- Section 703.121(b) of the Regulations Keystone stored spent pickle liquor (K062) in surface impoundments and radioactive arc dust (K061) in containers and tanks without a RCRA permit. Keystone failed to comply with the requirements of Section 722.134(a) and no longer qualifies for the exemption from RCRA permitting for generators who accumulate waste on-site for 90 days of less.
- Section 703.150(a) of the Regulations Keystone stored spent pickle liquor (K062) in surface impoundments without a Part A permit.
- Section 722.111 of the Regulations Keystone failed to make the correct hazardous waste determination of the waste material from the clean-up of the spent pickle liquor (K062). Keystone failed to make a waste determination of the five barrels of unknown waste in the hazardous waste accumulation area in the Mid Mill Building.

Section 722.112(c) of the Regulations - Keystone sent the hazardous waste from the spill and

- clean-up of the spent pickle liquor (K062) to a disposal facility that did not have a USEPA Identification Number.
- Section 722.120(a) of the Regulations Keystone sent the hazardous waste from the spill and clean-up of the spent pickle liquor (K062) to a disposal facility without using a manifest.
- Section 722.120(b) of the Regulations Keystone sent the hazardous waste from the spill and clean-up of the spent pickle liquor (K062) off-site without designating on the manifest one facility which is permitted to handle the waste.
- Section 722.121(a) of the Regulations Keystone sent the hazardous waste from the spill and clean-up of the spent pickle liquor (K062) off-site without using the manifest supplied by the Agency.
- Section 722.122 of the Regulations Keystone sent the hazardous waste from the spill and clean-up of the spent pickle liquor (K062) off-site without using the manifest supplied by the Agency.
- Section 722.123(a) of the Regulations Keystone sent the hazardous waste from the spill and clean-up of the spent pickle liquor (K062) off-site without signatures on the manifest, without retaining one copy of the manifest, and without sending a copy of the manifest to the Agency.
- Section 722.123(b) Keystone sent the hazardous waste from the spill and clean-up of the spent pickle liquor (K062) off-site without giving copies of the manifest to the transporter.
- Section 722.134(a)(2) of the Regulations Keystone failed to label with an accumulation date the container of hazardous waste from the clean-up of the June 28, 1996 acid spill.
- Section 722.134(a)(4) of the Regulations Keystone failed to comply with the requirements of Section 725.131. By sending the hazardous waste from the spill and clean-up of the spent pickle liquor (K062) to a nonhazardous waste landfill (Peoria City-County Landfill), Keystone failed to avoid sudden planned or unplanned releases of hazardous waste to the environment.
- Section 722.141(a) of the Regulations Keystone failed to include on its 1995 annual report the shipments off-site of hazardous waste from the spill and clean-up of spent pickle liquor (K062). Keystone failed to include on its 1995 annual report all the waste

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Keystone Steel & Wire Company ILD000714881 July 30, 1996 John Tripses Page 11

codes for the Waste Petroleum Naphtha. The manifests listed D001, D006, D008, D018, D035, D039, D040 but the annual report listed only D001.

- Section 725.113(b) of the Regulations Keystone did not have a written waste analysis plan.
- Section 725.131 of the Regulations By sending the hazardous waste from the spill and clean-up of the spent pickle liquor (K062) to a nonhazardous waste landfill (Peoria City-County Landfill), Keystone failed to avoid sudden planned or unplanned releases of hazardous waste to the environment.
- Section 725.173(b) of the Regulations The operating record did not contain the location and amount of the pickle liquor (K062) in storage.
- Section 725.174(a) of the Regulations The waste analysis plan was not available for inspection.
- Section 728.107(a) of the Regulations Keystone failed to determine if the hazardous waste generated from the spill and clean-up of the spent pickle liquor (K062) was restricted from land disposal.
- Section 728.107(a)(1) or Section 728.107(a)(2) of the Regulations Keystone failed to notify the disposal facility if the hazardous waste generated from the spill and clean-up of the spent pickle liquor (K062) did or did not meet the treatment standard.
- Section 21(e) of the Act Keystone disposed of the hazardous waste generated from the spill and clean-up of spent pickle liquor (K062) at a facility (Peoria City-County Landfill) that did not have a permit to accept that waste.
- Section 21(f) of the Act Keystone stored spent pickle liquor (K062) in surface impoundments and radioactive arc dust (K061) in containers and tanks without a RCRA permit. Keystone failed to comply with the requirements of Section 722.134(a) and no longer qualifies for the exemption from RCRA permitting for generators who accumulate waste on-site for 90 days of less.
- Section 21(i) of the Act Keystone generated hazardous waste from the spill and clean-up of spent pickle liquor (K062) and failed to comply with the requirements of regulations adopted by the Board under subsections (a) and (c) of Section 22.4 of the Act.

The apparent violations of Section 703.150(a), Section 725.113(b), and Section 725.173(b) [originally cited as Section 725.173] were originally observed during an inspection conducted on

February 22, 1985 and cited in a Compliance Inquiry Letter dated April 15, 1985. The apparent violations of Section 703.121(a) and Section 703.121(b) [originally cited as Section 703.121] were originally observed during an inspection conducted on February 23, 1988 and cited in a Compliance Inquiry Letter as dated April 15, 1988. The apparent violation of Section 725.174(a) was originally observed during an inspection conducted on November 28, 1988 and cited in a Compliance inquiry letter dated March 29, 1989.

The apparent violations of Section 722.111, Section 722.12(c), Section 722.120(a), Section 722.120(b), Section 722.121(a), Section 722.122, Section 722.123(a), Section 722.123(b), Section 722.134(a)(2), Section 722.134(a)(4), Section 722.141(a), Section 725.131, Section 728.107(a), Section 728.107(a)(1) or Section 728.107(a)(2), Section 21(e), Section 21(f), and Section 21(i) are new apparent violations based on this inspection.

Apparent violations of Section 725.291(a) and Section 725.293(a) were first observed during an inspection conducted on September 23, 1993 and cited in a Compliance Inquiry Letter dated November 5, 1993 are now resolved. Apparent violations of Section 725.115(a), Section 725.115(d), and Section 725.274 first observed during an inspection conducted on June 6, 1995 and cited in a Compliance Inquiry Letter dated October 31, 1995 and are now resolved. All these apparent violations are resolved because Keystone in no longer storing the radioactive arc dust (K061) in containers and tanks. Keystone still has to complete RCRA closure of these units.

Keystone appears to be complying with the latest court order for the closure of the surface impoundments.

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RCRA INSPECTION REPORT Division of Land Pollution Control 81 USEPA #: IL IEPA #: Phone #:309 ecility Name: Gross Butomidle (for Street Address: County: ODF Zip: 61607 City: State: Region: Inspection Date: 2123194 From: 9:304~ 12:300.m To: 232°F Weather: SOOWY TYPE OF FACILITY Regulated As: Generater Notified As: General 90-Day F/U Required?: TYPE OF INSPECTION Citizen Complaint: _ CEI: Sampling: Closed: Other: RE Wilhdrawat: B Follow-Up to inspection of: , CME/O&M: Record Review: MON-REGULATED STATUS Other (Specify in Nerrative):1994 SQG: Claimed Nonhandler: PARTA 8/18/80, from (initial) or (subsequent) Notification. Notification Date: 11/18/80 Initial Part A Date: Amended: 02 / 15 / 83 1 138182 Approved by (US)(IL) EPA: Part A Withdrawal requested: PART B PERMIT APPLICATION Final Permit Issued: Part B Permit Submitted: Y or N ENPORCEMENT USEPA: (Y)or N Has the firm been referred to -Illinois Attorney General: Y or N County State's Attorney: Y or N ORDERS ISSUED CAFO: Consent Decree: 6129193 CACO: Federal Court Order: PCB Order: State Court Order: THE EACH ITY ACTIVITY SUBMILLEY

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Becky Vehslage	جم الحم	vironnental Scientist	812) 336-0972
Dave Semelroth	E	monated Enjear (Key)	
INSPECTION PARTICIPANT(S	s)	AGENCY/TITLE	PHONE #
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PREPARED BY		AGENCY/TITLE	PHONE #
Randol E Maholic	エ	EPA/EDS II	309/643-5462
SUMMARY OF	APF	ARENT VIOL	ATIONS
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NARRATIVE

On February 23, 1994, this author (Ronald Mehalic) conducted a post-RCRA Comprehensive Monitoring Evaluation (CME) at the Keystone Steel and Wire Company in Bartonville, Illinois. The purpose of this inspection was to observe and evaluate the facility's groundwater sampling techniques, which could not be observed during the December 6, 1993 CME. Also, this author split groundwater samples with the facility's consulting firm, WW Engineering, at wells, T-6A and T-6B. Keystone's IEPA No. is 1430050001 and USEPA No. ILD000714881. Keystone notified as a generator, and is currently regulated as a generator/storage/treatment facility.

Keystone produces nails, barbed wire, fence wire, and other wire products. Prior to October of 1986, generated spent pickle liquor (K062) was placed in a series of surface impoundments. Currently, the spent pickle liquor is treated in an exempt wastewater treatment unit. The sediments that have accumulated in these surface impoundments are considered to be contaminated due to contact with the spent pickle liquors. The following regulated units are going under RCRA closure and are considered to be contaminated:

- 1. North Ditch
- 2. Mid-Mill Ditch
- 3. South Ditch North Half
- 4. South Ditch South Half
- 5. Surface Drainage Ditch
- 6. North Dredge Pile
- 7. South Dredge Pile
- 8. 24-Hr. Retention Reservoir

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(see Figure 3.1 for surface impoundment locations)

This author arrived at the facility at 9:30 a.m. and met with Becky Vehslage, Environmental Scientist for WW Engineering. The weather was cold, snowy and it was approximately 32° F. Ms. Vehslage directed this author to the on site laboratory used to measure pH and specific conductance in a controlled environment. Temperature is

1430050001 - Peoria Keystone Steel & Wire Co. ILD000714881 SUBPART F

measured directly in the field. Photograph 1 shows the firms pH and specific conductance instruments with buffer solutions, and data sheets (see site sketch). Photograph 2 shows collected and tagged groundwater samples. groundwater samples are to be analyzed for volatile organic compounds. The samples collected are Federal Expressed to the firms laboratory in Bloomington, Indiana. Chain of custody was adequately followed. Photograph 3 shows the teflon bailers with stainless steel wire used to collect groundwater samples. All bailers and wire are dedicated to each specific groundwater monitoring well. Notice the numbers on the plastic wrap for each bailer. The bailers and wire are decontaminated at the laboratory for each sampling event.

During this sampling event, WW Engineering & Sciences's sampling team was comprised of the following technicians:

Rich Flores/Geologist Marty Lytle/Geologist Jeff Bryan/Geologist Rob Conway/Geologist

Photograph 4 shows Rich Flores and Marty Lytle simultaneously purging groundwater (three well volumes) from monitoring wells T-6A and T-6B. The purged groundwater is emptied into 5 gallon containers (see photographs 4 and 6) and in turn emptied into a 55 gallon barrel located in the back of the sampling teams van. Photograph 6 shows the sampling team filling a 40 ml glass vial. The vial was filled to just overflowing, ensuring that no air bubbles were formed. vial was sealed, labeled with site name, well number, date and name of sampler, and placed in an insulated cooler. author collected groundwater samples from the aforementioned wells (see site sketch). Photographs 5 and 7 show the collected samples adjacent to the wells sampled. The samples are to be analyzed for volatile organic compounds (see attached special analysis forms). Chain of custody (attached) was adequately followed for the samples collected.

After collecting the groundwater samples, this author accompanied the firms other sampling team consisting of Jeff Bryan and Rob Conway to the air stripper located on site. The air stripping system has been in full operation since the latter part of January 1994. Keystone is in the process of performing a groundwater remediation program for the TCE contaminated groundwater. The groundwater remedial action plan includes groundwater capture and recovery using a network of purge wells, treatment of recovered groundwater

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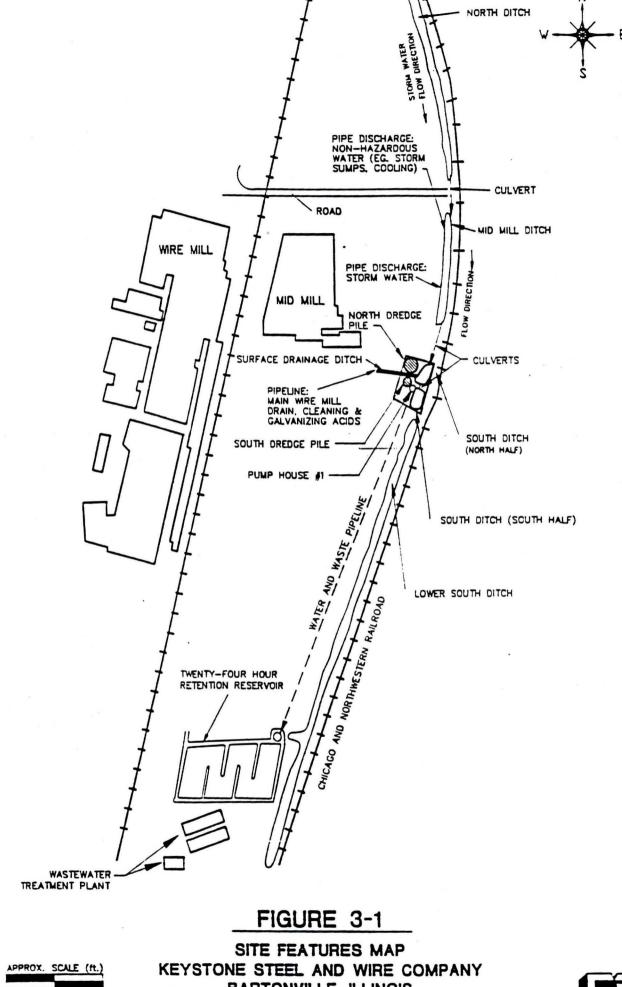
via air stripping, and discharge of the treated groundwater as a process water into the facility's steel wire production. Photograph 8 shows a 55 gallon barrel full of purged groundwater in the back of the sampling teams truck. The purged groundwater is emptied into a floor drain (see photograph 9) that is connected to the air stripping tower. All purged groundwater is emptied here and is mixed with the pumped groundwater from the four pumping wells four remediation.

This author then proceeded to Mr. Dave Semelroth's office for an exit interview. Mr. Semelroth is Keystone's Environmental Engineer. The Sampling and Analysis Plan (SAP) is kept on site, as well as all quarterly groundwater data and pertinent reports regarding the groundwater remediation. Mr. Semelroth signed the Agency's Receipt for Samples form (attached) for the groundwater samples obtained.

Based on the field inspection, all sampling and analytical procedures are consistent with sampling plan contained in the Keystone Groundwater Remediation Program and also in Section 10.2 of Keystone's "Phase II Closure Plan" dated July 1, 1991. This plan was modified and approved in an Agency RCRA-Closure approval (C-521-M-6) dated September 30, 1992. The modification included changes proposed in a July 10, 1992, letter from Keystone. The laboratory's analytical procedures, contained in Appendix D of Keystone's "Phase II Closure Plan", meet or exceed all the requirements of RCRA.

No apparent violations were observed at the time of the inspection.

This author left the facility at 12:30 p.m.



KEYSTONE STEEL AND WIRE COMPANY

BARTONVILLE, ILLINOIS



